## Group Exhibit B

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Page 1
                                                                                                                                Page 3
          IN THE UNITED STATES DISTRICT COURT
                                                                         Deposition Exhibit 17
                                                                                                                   115
         FOR THE SOUTHERN DISTRICT OF ILLINOIS
                                                                     2
                                                                            (Exhibits retained by the Reporter and attached.)
CALEB BARNETT, et al.,
   Plaintiffs,
                                                                     3
                                                                           (Exhibit 15 was marked and attached, but was not
                                      ) Case No. 3:23-cv-209-SPM
                                                                     4
                                                                           introduced on the record.)
VS.
                                       Designated Lead Case
                                                                           (The material quoted in the transcript was written verbatim
KWAME RAOUL, et al.,
                                                                           as read, and may not be a direct quote from the exhibit.)
  Defendants.
DANE HARREL, et al.,
  Plaintiffs,
                                      ) Case No. 3:23-cv-141-SPM
                                                                    10
KWAME RAOUL, et al.,
                                                                    11
  Defendants.
JEREMY W. LANGLEY, et al.,
  Plaintiffs.
                                       Case No. 3:23-cv-192-SPM
                                                                    14
                                                                    15
KWAME RAOUL, et al.,
                                                                    16
  Defendants.
                                                                    17
FEDERAL FIREARMS LICENSEES OF
ILLINOIS, et al.,
  Plaintiffs,
                                      ) Case No. 3:23-cv-215-SPM
                                                                    20
                                                                    21
JAY ROBERT "JB" PRITZKER, et al.,
                                                                    22
  Defendants.
         VIDEOTAPED DEPOSITION OF SCOTT PULASKI
                                                                    23
            Taken on behalf of the Defendants
                     October 3rd, 2023
                 2:06 p.m. to 6:04 p.m.
                                                                    25
        Jamie Jo Kinder, CCR 842, CSR 084.003306
                                                            Page 2
                                                                                                                                Page 4
 1
                                INDEX
                                                                                   IN THE UNITED STATES DISTRICT COURT
                                                                                  FOR THE SOUTHERN DISTRICT OF ILLINOIS
 2
                                                 Page
                                                                     2
                               EXAMINATION
 3
     QUESTIONS BY MR. WELLS
                                                    7
                                                                         CALEB BARNETT, et al.,
     QUESTIONS BY MR. MAAG
                                                                     4
                                                                            Plaintiffs.
     QUESTIONS BY MR. WELLS
                                                 157
                                                                     5
                                                                                                            ) Case No. 3:23-cv-209-SPM
 8
                                                                     6
                                                                                                            ) Designated Lead Case
                                                                         KWAME RAOUL, et al.,
 9
10
                                 EXHIBITS
                                                                            Defendants.
     Deposition Exhibit 1
11
     Deposition Exhibit 2
                                                                         and all related cases.
12
                                                  29
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     Deposition Exhibit 3
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                                                                                    VIDEOTAPED DEPOSITION OF WITNESS, SCOTT PULASKI,
14
     Deposition Exhibit 4
                                                  43
                                                                    11
                                                                         produced, sworn, and examined on the 3rd day of October.
15
     Deposition Exhibit 5
                                                  49
                                                                    12
                                                                         2023, between the hours of 8:00 o'clock in the forenoon and
                                                                    13
                                                                         5:00 o'clock in the afternoon of that day, at the Office of
     Deposition Exhibit 6
16
                                                                    14
                                                                         the Illinois Attorney General, 201 West Pointe Drive, Suite
17
     Deposition Exhibit 7
                                                  55
                                                                    15
                                                                         7. Swansea. IL. before Jamie Jo Kinder. Missouri CCR 842.
18
     Deposition Exhibit 8
                                                  59
                                                                    16
                                                                         Illinois CSR 084-003306, a Certified Shorthand Reporter
19
    Deposition Exhibit 9
                                                  66
                                                                    17
                                                                         within and for the State of Illinois, in a certain cause
                                                                    18
                                                                         now pending in the United States District Court for the
20
    Deposition Exhibit 10
                                                  69
                                                                    19
                                                                         Southern District of Illinois.
21
     Deposition Exhibit 11
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     Deposition Exhibit 12
                                                  82
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                                                                    22
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     Deposition Exhibit 13
                                                  99
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     Deposition Exhibit 14
                                                 104
                                                                    24
25
    Deposition Exhibit 16
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	Page 5		Page 7
1 2	A P P E A R A N C E S  For the Plaintiffs Langley, et al.:	1	State defendants.
3	Mr. Thomas G. Maag	2	THE VIDEOGRAPHER: Would the court reporter
4	MAAG LAW FIRM, LLC 22 W. Lorena Avenue	3	please swear in the witness.
1	Wood River, IL 62095	4	(Witness sworn in.)
5	(618) 216-5291	5	MR. WELLS: I'll just make the note again,
6	tmaag@maaglaw.com	6	that this is specifically in the Langley versus Kelly case,
7	For the Defendants Raoul and Kelly:	7	which is Case No. 3:23-cv-192-SPM, also in the Southern
8	Mr. Christopher G. Wells Ms. Gretchen Helfrich	8	District of Illinois.
9	OFFICE OF THE ATTORNEY GENERAL	-	
1.0	100 W. Randolph Street	9	As I noted in the prior deposition, we're
10	Chicago, IL 60601 (312) 814-3000	10	taking this deposition in light of the Langley plaintiffs
11	christopher.wells@ilag.gov	11	having filed a motion for summary judgment on their two
12	For Cole Shaner:	12	vagueness claims. The State defendants reserve their
14	Mr. Keith Hill (via Zoom)	13	rights to seek additional discovery and potentially to take
1.5	HEYL ROYSTER VOELKER & ALLEN	14	additional depositions, including a second deposition of
15	103 W. Vandalia Street, Suite 100 Edwardsville, IL 62025-0467	15	this witness, related to other claims that have been
16	(618) 656-4646	16	asserted in Langley and Barnett and the consolidated
17	khill@heylroyster.com	17	actions there. So just make that note for the record.
18	Also present via Zoom: Mr. John Zimmerman and	18	With that reservation of rights, we're going
19	Ms. Abby Sgro, in-house counsel for ISP		
20	in-nouse counsel for isp	19	to proceed with this deposition.
21	Ms. Jamie Jo Kinder, CCR, CSR	20	- · · · · ·
22	Mr. Ken Carden, Videographer LEXITAS LEGAL	21	SCOTT PULASKI,
	711 N. Eleventh Street	22	of lawful age, being produced, sworn and examined on
23	St. Louis, MO 63101 (800) 280-3376	23	behalf of the Defendants, deposes and says:
24	https://lexitaslegal.com	24	EXAMINATION
25	stl.customerservice@lexitaslegal.com	25	QUESTIONS BY MR. WELLS:
25			
			<b>D</b> •
1	Page 6 (Deposition commenced at 2:06 p.m.)	1	Page 8 Q Have you ever been deposed before,
1 2		1 2	
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1.23-	Scott I	Pula	0/23  Page 4 01 250  Page 1D #3924 aski
1	Page 9 Q Mr. Maag may object from time to time.	1	Page 11 thing?
2	Generally speaking, if he objects, you still have to answer	2	A I do.
3	the question unless he specifically instructs you not to.	3	Q You are not a plaintiff in the Langley case;
4	There are a couple reasons why he might do that. If those	4	correct?
5	come up, we'll deal with them. But generally speaking,	5	A Correct.
6	even if he objects, you can still answer, if you	6	Q What is your relationship to the Langley
7	understand. Fair enough?	7	lawsuit?
8	A Okay.	8	A As an affidavit filer. Sorry. I don't know
9	Q If you need a break at any time, let me know.	9	the term for that. But was asked to prepare an affidavit
10	If you need a water, if you need to go to the restroom,	10	
11	it's not a problem. The only thing I'd ask is that if	11	Q When did he ask you to prepare that affidavit?
12	there's a question pending, I'd ask you to finish answering	12	A I do not remember the date for that.
13	that guestion before we take a break.	13	Q Does Mr. Maag represent you in this case?
14	A Certainly.	14	A In the Langley
15	Q And just to be clear in terms of timing, so we	15	Q This case
16	started at 2:00 o'clock. I am hoping we can be out of here	16	A In the Langley case, no.
17	by 6:00, but that is depends on how things go obviously.	17	Q Does he represent you in any other capacity?
18	Right?	18	A I believe we're in the early stages of another
19	A Okay.	19	case, yes.
20	Q Do you have any scheduled commitments that I	20	Q What is that other case?
21	should be aware of as we go through this?	21	A I do not recall the name of that case.
22	A Just at 8:00 p.m.	22	Q So Mr. Maag is your attorney in another
23	Q Okay.	23	lawsuit that you filed against officials in the State of
24	MR. MAAG: If we're still here at 8:00 p.m.	24	Illinois; is that right?
25	Q (By Mr. Wells) Yeah. Well, understood.	25	A Correct.
	Page 10		Page 12
	Mr. Pulaski, are you And I apologize for the probing	1	Q When Mr. Maag asked you to write an affidavit,
	nature of this question, but are you on any medication	2	what what specifically were you asked to write an
3	today that would affect your ability to answer testify	3	affidavit about?
	truthfully and completely?	4	A About the vagueness of the PICA and some of
5	A lam not.		the lack of clarity of things in there.
6	Q Are you on any drugs or that would have a	6	Q And is Mr. Maag representing you today in this
7	similar effect and impact your ability?	7	deposition?
8	A No.	8	A I don't understand. I'm sorry.
9	Q Just I ke practice, so you just got to wait.	9	Q No, I understand.
10	How about alcohol, are you on have you had	10	A I'm new to depositions.
11	any alcohol today?	11	Q Is he serving as your attorney for purposes of
12 13		12 <b>13</b>	this deposition today?
			A Not to my knowledge.  MR_MAG: As long as we're not touching on
14	9 1 7 1	14	MR. MAAG: As long as we're not touching on the other case.
15	Langley case have filed a motion for summary judgment on two claims in that case. The Langley plaintiffs lawsuit	15 16	MR. WELLS: Which Oh, the other case that
17		17	he's filed?
	challenges the constitutionality of Illinois Public Act	18	MR. MAAG: Yes.
18	102-1116. It's also known as the Protecting Illinois		
19	Communities Act. We can shorten that to PICA. I'm going	19	MR. WELLS: For which you are his attorney?
20	to use PICA to refer to the statute that's being challenged	20	MR. MAAG: Correct.
21	in the Langley case. Is that fair?	21	Q (By Mr. Wells) Okay. So in the Langley case
22	A Yes.	22	, , , , , , , , , , , , , , , , , , , ,
23	Q And if I say PICA, you understand I'm talking	23	A live never been qualified as an expert
24	, ,	24	witness, but I have long experience in the field of
25	2023, and regulates assault weapons and and that sort of	25	firearms.

	Scott	Pula	SKI	
1	Page 13 Q So are you being put forward as an expert	1	Q The	Page 15 named plaintiff there, the named party, is
2	witness in this case?	2		Piasa Armory; correct?
3	A I would presume so.	3	A Cor	
4	MR. WELLS: Is he being put forward as an	4		I you, the individual, Scott Pulaski, are
5	expert witness in this case under Rule 702?	5		plaintiff in that case; is that right?
6	MR. MAAG: I'd have to reread the rule for the	6		my knowledge.
7	particularities. I think it's more of a fact witness,	7		MAAG: As far as I know, that's correct.
8	but	8		Mr. Wells) And when you say Mr. Michel,
9	MR. WELLS: Okay. So your understanding is	9	` •	presents Piasa Armory; is that
10	that Mr. Pulaski is serving as a fact witness?	10		of I'm sorry. All of the plaintiffs.
11	MR. MAAG: Yes.	11		pht. But including Piasa Armory; is that
12	MR. WELLS: Can we go off the record for just	12	right?	inc. But mordaing Flada 7 miory, is that
13	one second? Sorry.	13		rrect.
14	THE VIDEOGRAPHER: This is the videographer.	14		d he exclusively represents Piasa Armory.
15	We're going off the record. Time now is 2:14.	15		represent Scott Pulaski because Scott Pulaski
16	(Whereupon, a short break was taken.)	16		plaintiff in that case; correct?
17		17		rrect.
	THE VIDEOGRAPHER: This is the videographer.	18		
18	We're back on the record. The time now is 2:16.			d you have indicated that Mr. Maag you
19	Q (By Mr. Wells) I just want to clarify. So are	19	-	Maag being your counsel for purposes of this
20	you a plaintiff, you personally, a plaintiff in any other	20	deposition to	•
21	case?	21	A Ye	
22	A I am a plaintiff in the I'm sorry. I can't	22		n you tell me about how you went about
23	recall the the named plaintiff, but we are Piasa	23		our January 23rd, 2023, affidavit, for the
24	Armory is a plaintiff in one of these cases, which is my	24	Langley case	
25	company.	25	A fe	ah. This was with assistance from Mr. Maag.
	Page 14			5 40
1		1	Basically wo	Page 16
1	Q (By Mr. Wells) Your company is a plaintiff?	1	•	rking together to provide and clarify
2	<ul><li>Q (By Mr. Wells) Your company is a plaintiff?</li><li>A Correct. I I am specifically not.</li></ul>	2	information	orking together to provide and clarify that would be of assistance to these cases.
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2 3 4	Q (By Mr. Wells) Your company is a plaintiff?  A Correct. I I am specifically not.  However, my company is.  Q You, as an individual, are not?	2 3 4	information Q How A Sev	that would be of assistance to these cases.  I long have you known Mr. Maag?  eral years.
2 3 4 5	Q (By Mr. Wells) Your company is a plaintiff?  A Correct. I I am specifically not.  However, my company is.  Q You, as an individual, are not?  A Correct.	2 3 4 5	information Q How A Sev Q How	that would be of assistance to these cases.  I long have you known Mr. Maag?  eral years.  I do you know him?
2 3 4 5 6	Q (By Mr. Wells) Your company is a plaintiff?  A Correct. I I am specifically not.  However, my company is.  Q You, as an individual, are not?  A Correct.  MR. MAAG: As far as I know, him as an	2 3 4 5 6	information Q How A Sev Q How A Three	that would be of assistance to these cases. I long have you known Mr. Maag? eral years. I do you know him? ough our business.
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	Scott	Pula	aski
1	Page 1' Q When you prepared your January 23, '23		Page 19 that there may you estimate a 50 percent loss of
2		2	revenue. That's if PICA stays in effect; right?
3		3	A That is as it has been since January and
4	, , ,	4	January 10th and going forward, I would assume so.
5		5	Q And so if Excuse me. If PICA is struck
6	•	6	down, then you won't lose that estimated 50 percent of
7		7	revenue; is that right?
8		8	A The revenue has already been lost for the time
9	•	9	that it's been active. However, we would assume to go back
10	Q Are you being Or were you compensated for	10	to that standard revenue we had been seeing before.
11		11	Q So is it fair to say whether or not PICA
12		12	remains in effect will affect your business?
13	3 Q Are you being paid for your testimony today?	13	A Absolutely.
14		14	Q What's the nature of your other lawsuit
15		15	against the against an Illinois gun regulation?
16		16	A That was a challenge to the advertising rules
17		17	· ·
18		18	Q What do you mean by the advertising rules?
19		19	A Sorry. I don't recall the specifics of that
20	0 Q What claims did Piasa Armory bring in that	20	law. But basically, that you couldn't firearm
21	• •	21	businesses or the industry could not advertise to in a
22	2 A I did not write that or I'm not I don't	22	manner that enticed children to buy firearms, which is
23	3 recall the specifics of that claim. But basically, that it	23	already illegal.
24		24	Q Are you a party in any other lawsuits?
25	5 ruling excuse me the ruling from the Supreme Court.	25	A No.
1	Page 19 I Q Did Piasa Armory, in that lawsuit, Federal	3   1	Page 20 Q Have you other than the two lawsuits
2	2 Firearms Licensee of Illinois versus Pritzker, No.	2	Excuse me.
3	3 23-cv-215-SPM, assert that PICA was unconstitutionally	3	Other than the one lawsuit that we just
4	1 vague?	4	described and the lawsuit involving Piasa Armory
5	A I I did not make that filing. I don't	5	challenging PICA, have you been involved in any other
6	recall if that was in that.	6	lawsuits in your life?
7	Q What financial impact has PICA had on your	7	A Not to my knowledge.
8	B business at Piasa Armory?	8	Q Have you testified as an expert in any other
9	A We estimate approximately 50 percent loss o	f 9	lawsuits?
10	0 revenue.	10	A I have not. I have testified to the state at
1	1 Q You say estimate.	11	a committee hearing, but have not been asked to testify as
12	2 A Yes.	12	an expert before.
13	3 Q But you don't know for certain, though; right?	13	Q When did you testify to the state in a
14	4 A I do not.	14	committee hearing?
1	5 Q And what is the nature of Piasa Armory's	15	A Before PICA was passed.
16	6 business, generally?	16	Q What was the nature of your testimony?
17	7 A We sell firearms, provide training, gunsmith	17	A It was explaining the nature of the FOID card,
18	8 services and a shooting range.	18	what requirements individuals must go through to pass it,
19	9 Q So sell firearms, gunsmith, shooting range?	19	and the process of buying a firearm in Illinois.
20	0 A Yes, and also training. And, of course,	20	Q How did you come to give that testimony?
2	1 accessories, too.	21	A I was asked by State Representative Elik.
22	Q And you You personally hope that PICA is	22	Q Spell that, please.
23	3 struck down as unconstitutional; right?	23	A E-L-I-K.
24	4 A Personally, yes.	24	Q And the purpose of your testimony, as you
2	Q And in terms of Piasa Armory, you indicated	25	understood it, was to lobby against the passage of PICA?

Page 21 Page 23 A No. I was providing information on the A Correct. Those rifle magazines are typically 2 not described in PICA, however. Some handgun magazines 2 current gun laws in Illinois and answering guestions of the committee. 3 are. 3 But was your personal hope that PICA would not 4 Q There's another vagueness claim in the Langley 5 be passed? case related to the use of the term AR-type and AK-type. 6 A At the time, that was not a potential. That Are you familiar with that claim? 7 was before PICA was even -- the process was started to pass 7 Δ lam PICA. 8 8 Q What's your understanding, in your own words, 9 O What -- What time period was that testimony? 9 of what that claim is? 10 Α I believe it was in the fall before of -- of 10 A That several of the items described as AR-15 11 2022. or similar bear only facial similarities to them. Similar 12 You understand that we're here talking about with the AK descriptions. In fact, the SKS that's 12 13 vagueness claims that have been brought by the Langley 13 described in the AK is not even remotely the same firearm. plaintiffs? When you say facial similarities, what do you 14 14 15 Α Yes. 15 mean? 16 What's your understanding of what those claims 16 Α Cosmetic only. 17 are? 17 Q What does cosmetic only mean? 18 A That the -- That PICA is describing things so 18 Similar color, similar overall shape, but broadly that it lacks clarity enough to allow enforcement 19 19 internally different, operationally different. by the state and by dealers and causes a lot of difficulty What does operationally different mean? 20 21 in purchasing and acquiring goods and services. 21 Manner of function of the firearm. And so if 22 the operational -- say, the gas system that causes function 22 Q Are you familiar with the claim in the Langley 23 case that the difference between the magazine capacity 23 to fire. limit as applicable to handguns versus long guns, are you 24 Ω What about cal ber? familiar with that claim? 25 Caliber can be interchanged on many of those Page 22 Page 24 1 Yes. 1 firearms. So last I recall was near four dozen, five dozen Α 2 And what's your understanding of that claim? 2 different calibers available for the AR-15. Both in That there's no way to tell if a magazine is 3 traditionally -- traditional rifle calibers and handgun for a handgun or a long gun. There's no exclusivity on 4 calibers. 5 many magazines. 5 O What's your current address? 6 6 You say many magazines, but --For the business or my home? 7 Many, many, many. Sorry. 7 Q Your home. But not all magazines; right? 8 g Δ Correct. q O And what's your date of birth? 10 There are some magazines for which the 10 Α 11 magazine will only work in a rifle; is that fair to say? 11 And what's your occupation? A It is. 12 12 I am the owner of Piasa Armory. 13 And is it also fair to say that there's some 13 Q How long have you been the owner of Piasa magazines for which the magazines will only function in a 14 14 Armory? 15 handgun? 15 Piasa Armory started business in 2012. 16 A It could be, yes. 16 Q What did you do before you were the owner of 17 Q Could be, or do you know? 17 Piasa Armory? 18 As -- In my experience, it is. There is 18 I owned another small gun business as well handgun-only magazines and rifle-only magazines just as called Pulaski Firearm Services from 2009 to 2012. 19 there are many that interchange between both. What did you do prior to Pulaski Firearm 20 20 21 Q So it's fair to say that there are rifle 21 Services? 22 22 magazines -- exclusive rifle magazines and exclusive A I was a security officer for a casino and in 23 handgun magazines, and then there are some group of other private security realms. Did process service and 23 magazines where they can be either for a rifle or a 24 worked as a police cadet and police explorer. 25 handgun? 25 Q As a police cadet, were you training to be a



		Scott	aic	15KI	
1	police of	Page 25 ficer?	1	Α	Page 2 Argosy Alton Belle.
2	A	I was.	2	Q	Any others?
3	Q	Why did you not become a police officer?	3	Α	No.
4	Α	At the time, it was not something I wanted to	4	Q	And did you carry a firearm in the course of
5	pursue.	<b>,</b>	5		rk at that casino?
6	Q	Was it your choice to not continue?	6	•	I did not.
7	A	Yes.	7	Q	So what type of firearm usage did you have in
8	Q	Prior to 2009, where were you employed?		that job?	,,
9	A	That was at security companies. I worked for	9	•	In that job, I had no firearm usage. In the
10		on Security, Hurst Investigation Services, and also	10		or Hurst Investigations, I was a process server an
11		sy Alton Belle Casino.	11		a firearm for that.
12	_	Can you briefly describe your education for	12		What kind of firearm did you carry when you
13		can you shony accombe your caucation for	13		process server?
14		Sure. I completed high school, have an	14		At the time, I carried a Springfield XD9.
15		ate's degree in criminal justice.	15	Q	What's the magazine capacity for a Springfield
16	_			XD9?	what's the magazine capacity for a Springheid
17	Q A	No.	17	AD9:	Sixteen rounds.
18	Q	And I don't mean this as an insult. This is	18	_	And is that 16 in the magazine or 15 plus one
			19	Q in the el	hamber?
19	-	gal term. But do you consider yourself a person			
20		ary intelligence?	20	Α	•
21	_	I do.	21	Q	Seventeen?
22	Q	Did you ever serve in the military?	22	Α	Correct.
23	A	I did not.	23	Q	For the firearm as a whole?
24	Q	Have you ever been convicted of a crime?	24		As a whole, yes. Sixteen in the magazine, one
25	Α	No, other than traffic violations.	25	in the fi	irearm.
1		Page 26 We've all been there.	1	0	Page 2 Have you ever published any articles, books or
2		And as I understand it, you're not offering			tings about firearms?
3		y as an expert witness, per Mr. Maag?	3		Not through official any official channels.
4		That's my understanding.			asional replies or blog posts or similar things.
		,	5		So you've written things on the internet about
5	_	Do you consider yourself a firearms expert?			,
6		I do.		firearms?	
7		And what qualifications do you have to serve	7		I have.
8		arms expert?	8		Where on the internet?
9		Extensive experience in the field and a	9		Sites like Reddit and Facebook. I've also
10	_	love for the knowledge of firearms.	10		terviewed many times by local media sources, like
11	Q	Do you have any formal training in firearms?	11		aranh in Altan KMOV and tha DivarDandar which i
12	Α	I do not.	12		Alton publication.
<b>12</b> 13	A Q	I do not. Have you ever	<b>12</b> 13		
13 <b>14</b>	Q <b>A</b>	Have you ever Sorry. I am a certified firearms instructor	12 13 14	also an	Alton publication.  What have you been interviewed about?  Firearms.
13	Q A for NRA	Have you ever Sorry. I am a certified firearms instructor , USCCA, and approved through the State of Illinois	12 13 14 15	also an Q A Q	Alton publication.  What have you been interviewed about?  Firearms.  And you've given interviews about PICA?
13 <b>14</b>	Q A for NRA for cond	Have you ever Sorry. I am a certified firearms instructor a, USCCA, and approved through the State of Illinois cealed carry instruction. And I was a firearm	12 13 14	also an Q A	Alton publication.  What have you been interviewed about?  Firearms.  And you've given interviews about PICA?  I have.
13 <b>14</b> <b>15</b>	Q A for NRA for cond	Have you ever Sorry. I am a certified firearms instructor , USCCA, and approved through the State of Illinois	12 13 14 15	also an Q A Q	Alton publication.  What have you been interviewed about?  Firearms.  And you've given interviews about PICA?
13 14 15 16	Q A for NRA for cond patrol c	Have you ever Sorry. I am a certified firearms instructor a, USCCA, and approved through the State of Illinois cealed carry instruction. And I was a firearm	12 13 14 15 16	also an Q A Q A	Alton publication.  What have you been interviewed about?  Firearms.  And you've given interviews about PICA?  I have.
13 14 15 16 17	A for NRA for cond patrol complete employed	Have you ever Sorry. I am a certified firearms instructor a, USCCA, and approved through the State of Illinois cealed carry instruction. And I was a firearm ardholder for my security work and a permanent	12 13 14 15 16 17	also an Q A Q A	Alton publication.  What have you been interviewed about?  Firearms.  And you've given interviews about PICA?  I have.  You're not a trained historian?
13 14 15 16 17 18	A for NRA for conceptrol compatrol complete the puring it	Have you ever Sorry. I am a certified firearms instructor A, USCCA, and approved through the State of Illinois cealed carry instruction. And I was a firearm ardholder for my security work and a permanent ee registration cardholder for that work as well.	12 13 14 15 16 17	also an Q A Q A Q	Alton publication.  What have you been interviewed about?  Firearms.  And you've given interviews about PICA?  I have.  You're not a trained historian?  I am not.
13 14 15 16 17 18 19	Q A for NRA for cond patrol condemploye During I	Have you ever Sorry. I am a certified firearms instructor a, USCCA, and approved through the State of Illinois cealed carry instruction. And I was a firearm ardholder for my security work and a permanent ee registration cardholder for that work as well. my time as casino employee, I worked in security	12 13 14 15 16 17 18	also an Q A Q A Q A	Alton publication.  What have you been interviewed about?  Firearms.  And you've given interviews about PICA?  I have.  You're not a trained historian?  I am not.  You're not a trained firearms historian?
13 14 15 16 17 18 19 20	Q A for NRA for cond patrol c employe During t there ar	Have you ever Sorry. I am a certified firearms instructor a, USCCA, and approved through the State of Illinois cealed carry instruction. And I was a firearm ardholder for my security work and a permanent ee registration cardholder for that work as well. my time as casino employee, I worked in security and also did training for that position as well.	12 13 14 15 16 17 18 19 20	also an Q A Q A Q A Q A	Alton publication.  What have you been interviewed about?  Firearms.  And you've given interviews about PICA?  I have.  You're not a trained historian?  I am not.  You're not a trained firearms historian?  I am not.
13 14 15 16 17 18 19 20	Q A for NRA for conc patrol c employe During I there an	Have you ever Sorry. I am a certified firearms instructor a, USCCA, and approved through the State of Illinois cealed carry instruction. And I was a firearm ardholder for my security work and a permanent ee registration cardholder for that work as well. my time as casino employee, I worked in security and also did training for that position as well. In the course of your employment prior to	12 13 14 15 16 17 18 19 20 21	also an Q A Q A Q A Q A Q A	Alton publication. What have you been interviewed about? Firearms. And you've given interviews about PICA? I have. You're not a trained historian? I am not. You're not a trained firearms historian? I am not. And you're not an attorney?
13 14 15 16 17 18 19 20 21	Q A for NRA for conc patrol c employe During I there an	Have you ever Sorry. I am a certified firearms instructor a, USCCA, and approved through the State of Illinois cealed carry instruction. And I was a firearm ardholder for my security work and a permanent ee registration cardholder for that work as well. my time as casino employee, I worked in security and also did training for that position as well. In the course of your employment prior to your own businesses, so as a security person, did	12 13 14 15 16 17 18 19 20 21 22	also an Q A Q A Q A Q A Q A	What have you been interviewed about?  Firearms.  And you've given interviews about PICA?  I have.  You're not a trained historian?  I am not.  You're not a trained firearms historian?  I am not.  And you're not an attorney?  Correct.  (Deposition Exhibit No. 1 marked for



Page 29 Page 31 go ahead and mark these. I'm going to hand you a copy of 1 A Working with Mr. Maag directly on that. 2 what's labeled Affidavit of Scott Pulaski, and it's dated 2 Was there any type of peer-reviewed 3 January 23rd, 2023. I'll mark it as Exhibit 1. methodology that you used? 4 A There's not a wide variety of peer-reviewed Thank you. 5 Q Do you recognize this document? 5 opportunities in our industry. 6 Α I do. 6 Q What methodology did you use in formulating 7 Q What is it? 7 your opinions in the May 18, 2023, affidavit? 8 This is the affidavit that I filed with 8 The same, working with Mr. Maag. Mr. Maag. 9 And do you know if that's the type of 9 10 Q And flipping to the last page, page six of 10 methodology typically relied upon by firearms experts? 11 six, is that your signature? 11 A I do not. I do -- I do understand that 12 Yes, it is. 12 firearm experts rely on their experiences in the field and 13 And everything in here is your testimony? 13 in publications and other informational sources they can 14 Correct. 14 find on any relevant firearms. 15 (Deposition Exhibit No. 2 marked for 15 Q And you mentioned that -- You gestured to some 16 identification.) 16 of the books that I have here. So, for instance, I have 17 Q (By Mr. Wells) Okay. All right. I'll hand 17 the Shooter's B ble, 114th Edition. Is this the type of thing that a firearms expert would rely upon for you what I'm going to mark as Deposition Exhibit No. 2. Do 18 18 19 you recognize this document? 19 information about firearms? 20 20 A I do. One of many sources, yes. 21 What is it? 21 And did you rely on some version of the 22 That is the statement filed with Mr. Maag. 22 Shooter's Bible in preparing the Exhibits 1 and 2? 23 A Directly, no. However, through my experience 23 And directing your attention to page seven of 24 this document. Is that your signature? 24 of using the Shooter's Bible in the past, that knowledge 25 would have been gained from that book. It is. Page 30 Page 32 Q And everything in Deposition Exh bit 2 is your And the Shooter's Bible is something that you 1 2 testimony; right? 2 rely upon in your work at Piasa Armory? 3 A Yes. 3 Correct. Through the course of business. 4 And in preparing Deposition Exh bits 1 and 2, 4 Are you familiar with the Shooter's B ble 5 so your January sworn statement and your May sworn 5 Guide to AR-15s, 2nd Edition? statement, you testified earlier that you just relied on 6 6 Α I am. 7 your knowledge of firearms; is that right? 7 Q Do you own this? 8 A Correct. 8 Α I'm sure that I do. I have a very large book 9 Did you rely on anything else in preparing? q shelf. 10 Knowledge of Mr. Maag as well. So we also use And is this Shooter's Bible Guide to AR-15s 10 11 things like the books you have here on the table, Shooter's 11 something that you rely upon in the course of your business Guide, things like the Blue Book of Gun Values, and various at Piasa Armory? 12 12 13 internet sources and other similar publications. 13 Occasionally, yes. Typically, that knowledge 14 Q So you collaborated to -- with Mr. Maag to 14 is stuff that I've gained over the years of experience. identify certain resources, and you relied on those 15 15 Q All right. So I'm going to direct your 16 resources? attention to Exhibit 1, your January 23, 2023, affidavit, 16 17 A Correct. paragraph three. You say, "I am personally familiar with 17 And are those the types of materials typically 18 18 firearms, both historical and modern, as well as firearms 19 relied upon by firearms experts? regulations both in Illinois and nationally on account that 20 Yes. 20 ATF, the federally agency that licenses my business, makes 21 Q How do you know? 21 me comply with all such laws and provides me a publication 22 Through my experience in the field and through 22 listing the current ones." various other comments through other firearms experts. 23 23 That's your testimony? 24 24 What methodology did you use in formulating Yes, sir. 25 your opinions in the January 23rd, 2023, affidavit? 25 And you say ATF, the federally agency. I



Page 33 Page 35 assume you meant federal agency? 1 to expel multiple projectiles with the exception of slugs, 2 2 where rifles are designed to fire a single projectile. Α Yes, sir. That's just a typo? Q Approximately how many firearms do you own? 3 Q 3 4 Yes. 4 Approximately 100. O How did you develop your familiarity with And in terms of pistols, what are the specific 6 firearms? 6 pistols you own? 7 A I started interest in firearms when I was 12 7 A I have a list, but I did not bring that list with me. But I have -through scouting and taking the merit badge programs that 8 9 scouting offers. And then researching independently after Q Just generally summarize. that, finding every available knowledge source that I could 10 A A variety of pistols from major manufacturers, access at the time and consuming as much of that knowledge 11 Glock, Smith & Wesson, Walther, for modern items. Antiques as possible. 12 such as Lefaucheux Pinfire, black powder replicas, foot 12 lock and cap lock design, World War I and World War II 13 Q What types of knowledge sources? 13 A Things like radio shows, books, publications military pistols. 14 14 15 like the Shooter's Bible. Things like the Blue Book of Gun 15 Q What about rifles? What types of rifles do Values. Any other historical documentation that I could 16 you own? 17 find or other books about the history of firearms. 17 A Everything -- Similar. So older cap lock 18 What firearms do you currently own? 18 design, military -- former military rifles from the early 1900's up through modern -- modern supporting rifle style, 19 A Wide variety from antique to modern, pistols, 19 rifles, shotguns, black powder, center fire, rim fire. AR-15, AK-47. 20 20 21 And pistols is a category of firearm that you 21 Q So you own AR-15 style rifles? understand what that means? 22 22 I do. 23 Α Yes. 23 Do vou own AK-47 style rifles? Q 24 24 O Rifles is a category of firearms, you Α I do. 25 understand what that means? 25 And when I say AR-15 style rifle, you Page 34 Page 36 1 Α Yes. 1 understand what I mean? 2 Q Shotgun is a category of firearms, you 2 A I do. understand what that means? 3 Q When I say AK-47 style rifle, you understand Α Yes. 4 what I mean? 5 Ω And you own firearms in each of those 5 Δ I do 6 6 categories? Do you own any other AR-type rifles? 7 A I do. I own AR-type rifles as listed in PICA. But 7 8 Q What's the difference between a pistol and a 8 they would not be considered AR-type rifles by the 9 rifle? 9 industry 10 A A pistol is typically designed to be fired 10 What are you including in that category? 11 with one hand, even though modern handgun shooting 11 The Bushmaster ACR is listed in the AR-15 techniques use two hands. Rifles are typically designed to style, but it's more similar to an AR-180 or AR-18 style 12 be held to the shoulder and fired with two hands. 13 13 rifle. Q What's the difference between a pistol and a 14 And why do you say it's -- the Bushmaster ACR 14 15 shotgun? 15 is more similar to an AR-180? 16 A A pistol, the same deal. It -- It's designed 16 It uses the operating system from an AR-18 or Α to be fired by one hand from the hand, not from the AR-180. 17 17 shoulder. Where a shotgun's designed to be placed in the 18 Do you have any AR-15 rifles that you would shoulder. Also, pistols expel a single projectile where agree are AR-type rifles? 19 shotguns typically expel multiple, with the exception of 20 20 Α I do. 21 slugs, which are a single projectile. 21 What are those? 22 Q What's the difference between a rifle and a 22 Piasa Armory is a manufacturer, so we have our 23 shotgun? 23 own branded AR-15 rifles. It's called the EBR-15, and I A Shotguns typically have a smooth bore, with 24 24 have several of those items. 25 the exception of slug barrels, which are rifle. Designed 25 Do you have AK-47 style rifles that you would



		Scott	Pula	ISKI	
1	understa	Page 37 and to be AK-type rifles?	1	Α	Page 39 I do. I'm a life member of the National Rifle
2	Α	I do. I have one.	2	Associa	ation.
3	Q	What's that?	3	Q	Do you consider American Rifleman a good
4	Α	That is a Romanian WASR-10, which is listed	4	source o	of information about firearms?
5	specific	ally in PICA.	5	Α	I do.
6	=	Does some of your knowledge about firearms	6	Q	Are you familiar with AR-15.com?
7		om the internet?	7	Α	lam.
8	A	It does.	8	Q	Have you been to that site?
9	Q	I'm going to ask you about some websites	9	A	Of course.
10	and	The going to don you discuss come mozenes	10	Q	Have you ever posted on that site?
11		Sure.	11	A	I'm sure that I have.
12	Q	and to see whether or not you rely on those	12	Q	Do you have a user name on that website?
13		s for your knowledge about firearms.	13	A	I do.
14			14	Q	What is that?
15		Are you familiar with Pew Pew Tactical?  I am.	15	A	
	_				, , ,
16	Q	Do you go to Pew Pew Tactical?	16	_	long time since I've used that website as content
17	Α	Occasionally.	17	-	er, so myself providing content.
18	Q	Do you rely on any information from Pew Pew	18		Say it one more time. ScottP?
19	Tactical		19	Α	***************************************
20	Α	Not often.	20		8113. Okay. So you said on AR-15.com, it's
21	Q	Why not?	21		while since you've been a content provider. But you
22	Α	That's just not one of my common sources.	22	-	there to read it?
23	Q	What are your common sources from the	23		It's been a while since I've been able to do
24	internet		24		Infortunately, business responsibilities keep me
25	Α	I typically look at sources that are more in a	25	from b	rowsing forums on a long for a long amount of
1	consum	Page 38 able format that I can use while driving back and	1	time S	Page 40 o I typically go for a specific bit of knowledge.
		_	2		Understood. And when you go for a specific
		work or doing tasks around the shop, instead of			· · ·
3	_	nd directly reading these days. So things like			owledge, it's a good resource to find that?
		c podcast, Gun Talk media.	4	Α	
5		What about guns.com, have you ever gone there?	5		How about gun manufacturers' websites, is that
6		I have.			that you rely upon in your business?
7		And do you rely on guns.com for information	7	_	It is.
8	about fire		8	Q	Do you ever look at product reviews from gun
9		Occasionally. We typically use them more as a	9		cturers' websites?
10		e for sales than information these days.	10		Typically, I prefer customer or consumer
11		How about AR Build Junkie, is that a website	11		s, be they in a forum or on sites such as YouTube,
12	•	miliar with?	12		can find a more unbiased review review source.
13	Α	It is not.	13	Q	So, for instance, if there was a gun
14	Q	When I say AR Build Junkie, do you have an	14	manufa	cturer's website, and there were user comments, you
	idea of w	hat AR means?	15	wouldn'	t rely upon that as much as you would, say, comments
15	lada oi v			on AD 1	
15 <b>16</b>		l do.	16	OII AK-I	5.com; is that fair to say?
		I do. What is that?	16 <b>17</b>		5.com; is that fair to say?  Not necessarily. A Comments provided by a
16	Α			Α	Not necessarily. A Comments provided by a
<b>16</b> 17	<b>A</b> Q <b>A</b>	What is that?	17	A user ra	Not necessarily. A Comments provided by a
16 17 18	<b>A</b> Q <b>A</b>	What is that? It would refer to an AR-15 style rifle and the	17 18	A user ra	Not necessarily. A Comments provided by a ther than comments provided by the company that
16 17 18 19	A Q A accesso	What is that? It would refer to an AR-15 style rifle and the pries and parts necessary to build one.	17 18 19	A user rati	Not necessarily. A Comments provided by a ther than comments provided by the company that es it's from a user.
16 17 18 19 20	A Q A accesso	What is that?  It would refer to an AR-15 style rifle and the pries and parts necessary to build one.  Are you familiar with American Rifleman?	17 18 19 20	A user ratindicate	Not necessarily. A Comments provided by a ther than comments provided by the company that es it's from a user.  Because the company might be biased?
16 17 18 19 20 21	A Q A accesso	What is that?  It would refer to an AR-15 style rifle and the pries and parts necessary to build one.  Are you familiar with American Rifleman?  I am.	17 18 19 20 21	A user ratindicate	Not necessarily. A Comments provided by a ther than comments provided by the company that es it's from a user.  Because the company might be biased?  Correct.
16 17 18 19 20 21 22	A Q A accessor Q A Q	What is that?  It would refer to an AR-15 style rifle and the pries and parts necessary to build one.  Are you familiar with American Rifleman?  I am.  What is that?  That's a publication by the National Rifle	17 18 19 20 21 22	A user rat indicate Q A Q	Not necessarily. A Comments provided by a ther than comments provided by the company that es it's from a user.  Because the company might be biased?  Correct.  All right. Let's see.
16 17 18 19 20 21 22 23	A Q A accesso Q A Q A Associa	What is that?  It would refer to an AR-15 style rifle and the pries and parts necessary to build one.  Are you familiar with American Rifleman?  I am.  What is that?  That's a publication by the National Rifle	17 18 19 20 21 22 23	A user ratindicate Q A Q	Not necessarily. A Comments provided by a ther than comments provided by the company that es it's from a user.  Because the company might be biased?  Correct.  All right. Let's see.  Paragraph three again in Exhibit 1. You say,



Page 41 Page 43 Illinois and nationally, on account that ATF, the federal 1 public acts. 2 agency that licenses my business, makes me comply with all Q I'm going to -- I'm not going to go too deep such laws and provides me a publication listing the current 3 into these, but I just want to make sure that we're talking 4 ones." about the same rough thing. 4 5 ATF licenses your business. How long have you 5 MR. WELLS: We're on four? (Deposition Exhibit No. 4 marked for been licensed by ATF at Piasa Armory? 6 6 7 Since 2012 7 identification.) And --O 8 8 Q (By Mr. Wells) I'm going to hand you what's --9 Actually -- May I correct that? I believe what I'm marking as Deposition Exhibit 4. Are you familiar 9 2013 is when we started with the license. 10 with this document? And you've maintained a federal firearms 11 11 I am. What is it? license for Piasa Armory since that time? 12 O 12 13 Yes, sir. 13 It's the Federal Firearms Regulations 14 And generally speaking, you've been complying 14 Reference Guide. with ATF regulations; is that fair to say? 15 Is this a document that you use in the course 16 16 of your business at Piasa Armory? 17 Q How do you, as a business at Piasa Armory, 17 Δ It is. ensure that you're in compliance with ATF regulations? 18 18 O Okay. In paragraph four of your January 23rd, 19 A I am, in addition to managing the day-to-day 19 2023, affidavit, which I've marked as Deposition Exhibit 1, operation, the compliance director for Piasa Armory also. 20 20 you say, "In addition to being a firearms dealer, Piasa 21 What does that involve? 21 Armory and myself teach Illinois State Police certified 22 That involves reviewing regularly every 22 concealed carry classes, both new and renewal." 23 firearm record, every transaction record that goes through 23 Yes. our company, and providing regular training as the Firearm 24 And as a certified concealed carry instructor, Dealer Licensing Act requires. you're familiar with the Firearm Concealed Carry Act in Page 42 Page 44 1 Q Do you review any publications from ATF? 1 Illinois? 2 A I do. They provide a national firearms law 2 Α update, which they just recently updated. And you also have a concealed carry license 4 Q You mentioned here, "ATF provides me a 4 yourself? 5 publication listing the current ones." 5 Ob I 6 6 What are you referring to there? Do you carry a concealed firearm in Illinois? 7 A I do not recall the title of that, but it's a 7 I do. 8 regularly updated publication that they provide. 8 What firearm do you carry? I typically carry either a Walther PPQ or a 9 Q Okay. I'm going to mark Exhibit 3. 10 (Deposition Exhibit No. 3 marked for 10 Glock 19 or 17. identification.) 11 11 What's the magazine capacity on a Walther PPQ? 12 Q (By Mr. Wells) I'm showing Mr. Pulaski what I Either a 15 in the magazine or 19 in the 12 have marked as Deposition Exhibit No. 3. It's a document 13 magazine. titled State Laws and Published Ordinances, Illinois. Is 14 And now that PICA is in effect, if you're this a document that you've seen before? 15 15 carrying your Walther PPQ, do you understand which magazine 16 Α Yes. 16 you should carry? 17 A I do. 17 Q And what is it? 18 This lists all of the relevant state laws 18 And which magazine is that? pertaining to firearms that we're required to follow by ATF 19 Fifteen round is required by PICA. and by the state law. With respect to your Glock 19 or 17, what are 20 20 21 Q And when you mentioned earlier that you review 21 the magazine capacities for the Glock 19? Let's start with 22 that one. 22 information from the state and also from the federal 23 23 government, this is the type of thing you're referring to? Standard capacity is 15 in the magazine; however, it can accept larger magazines, 17, or magazines 24 A Yes, this and some of the things that are 24 provided on the Illinois General Assembly website and with extensions up to 33 or 50.



	Scott	5	Page 47
1	Q And when you carry your Glock 19 now, what	1	A Yes.
	size magazine do you carry?	2	Q And that was just a typo?
3	A Fifteen now.	3	A Correct.
4	Q And is that because of PICA?	4	Q You believe there are, quote, parameters,
5	A It is.	5	close quote, for what most firearms experts would consider
6	Q So you understand that you can no longer carry	6	an AR-type; correct?
7	the 17-round magazine for your Glock 19?	7	A Correct.
8	A I do.	8	Q In your mind, what are the parameters that
9	Q How about your Glock 17, what's the magazine	9	most firearms expert would consider to be an AR-type?
10	capacity for that?	10	A An AR-type would be a firearm with typically a
11	A Seventeen is standard. Glock now makes	11	16 or 20-inch barrel, adjustable or fixed stop, pistol
12	15-round magazines that also fit that firearm.	12	grip, detachable magazine, and using a a direct
13	Q Do you have any of those 15-round magazines?	13	impingement gas system, rotary-operated bolt.
14	A I do not.	14	Q Why did those design elements make something
15	Q Could you acquire them?	15	an AR-type?
16	A I could.	16	A Because that's what the designer of the AR
17	Q And you would know that in acquiring the	17	used to create that firearm.
18	15-round magazine, that would be something that would	18	Q Who was the designer of the AR?
19	comply with PICA; right?	19	A Eugene Stoner.
20	A I do; however, I've chosen to not carry the 17	20	Q Who was Eugene Stoner?
21	and rather just carry the 19.	21	A Eugene Stoner worked for ArmaLite and several
22	Q And do you own any 17-round magazines for the		other companies in the mid 1900s, 1950s, 1960s, to develop
23	Glock 19?	23	
24	A I do.	24	Q And you understand that when people use the
25	Q But now you just carry the 15-round magazines		term AR-type today, they are referencing firearms that are
20	a but now you just outly the 10 found magazines		to, at type today, they are referencing medine that are
1	Page 4 for the Glock 19; right?		Page 48 connected to that AR-15 that Eugene Stoner denied
2	A Correct.	2	designed?
3	Q And you understand that as a concealed carry	3	A Some people Some people reference that, and
4	license holder, you're allowed to carry a concealed	4	some tend to refer to any firearm that looks vaguely like
	handgun; correct?	5	it as an AR-type rifle.
6	A Correct.		
		6	• •
		6	Q And in terms of how you went about identifying
7	Q You're not allowed to carry a concealed rifle;	7	Q And in terms of how you went about identifying those particular features that you would consider
7 8	Q You're not allowed to carry a concealed rifle; correct?	7 8	Q And in terms of how you went about identifying those particular features that you would consider associated with an AR-type firearm, how did you identify
7 8 <b>9</b>	Q You're not allowed to carry a concealed rifle; correct?  A Correct.	7 8 9	Q And in terms of how you went about identifying those particular features that you would consider associated with an AR-type firearm, how did you identify those particular features?
7 8 <b>9</b> 10	Q You're not allowed to carry a concealed rifle; correct?  A Correct.  Q You're not allowed to carry a concealed	7 8 9 <b>10</b>	Q And in terms of how you went about identifying those particular features that you would consider associated with an AR-type firearm, how did you identify those particular features?  A Based on the designs that Stoner produced.
7 8 <b>9</b> 10	Q You're not allowed to carry a concealed rifle; correct?  A Correct. Q You're not allowed to carry a concealed shotgun; correct?	7 8 9 <b>10</b> 11	Q And in terms of how you went about identifying those particular features that you would consider associated with an AR-type firearm, how did you identify those particular features?  A Based on the designs that Stoner produced.  Q Would you consider an AR-10 an AR-type rifle?
7 8 9 10 11 12	Q You're not allowed to carry a concealed rifle; correct?  A Correct. Q You're not allowed to carry a concealed shotgun; correct? A Correct.	7 8 9 <b>10</b> 11 <b>12</b>	Q And in terms of how you went about identifying those particular features that you would consider associated with an AR-type firearm, how did you identify those particular features?  A Based on the designs that Stoner produced.  Q Would you consider an AR-10 an AR-type rifle?  A Similar, but different. It's Shares a lot
7 8 9 10 11 12 13	Q You're not allowed to carry a concealed rifle; correct?  A Correct. Q You're not allowed to carry a concealed shotgun; correct? A Correct. Q All right. I'm going to direct your attention	7 8 9 10 11 12 13	Q And in terms of how you went about identifying those particular features that you would consider associated with an AR-type firearm, how did you identify those particular features?  A Based on the designs that Stoner produced.  Q Would you consider an AR-10 an AR-type rifle?  A Similar, but different. It's Shares a lot of the same characteristics. But the AR-10 was typically a
7 8 9 10 11 12 13	Q You're not allowed to carry a concealed rifle; correct?  A Correct. Q You're not allowed to carry a concealed shotgun; correct? A Correct. Q All right. I'm going to direct your attention to Exhibit 2. So this is your May 18, 2023, declaration,	7 8 9 10 11 12 13 14	Q And in terms of how you went about identifying those particular features that you would consider associated with an AR-type firearm, how did you identify those particular features?  A Based on the designs that Stoner produced. Q Would you consider an AR-10 an AR-type rifle? A Similar, but different. It's Shares a lot of the same characteristics. But the AR-10 was typically a machine gun designed for the military. There's been a
7 8 9 10 11 12 13 14 15	Q You're not allowed to carry a concealed rifle; correct?  A Correct. Q You're not allowed to carry a concealed shotgun; correct? A Correct. Q All right. I'm going to direct your attention to Exhibit 2. So this is your May 18, 2023, declaration, paragraph 26.	7 8 9 10 11 12 13 14	Q And in terms of how you went about identifying those particular features that you would consider associated with an AR-type firearm, how did you identify those particular features?  A Based on the designs that Stoner produced.  Q Would you consider an AR-10 an AR-type rifle?  A Similar, but different. It's Shares a lot of the same characteristics. But the AR-10 was typically a machine gun designed for the military. There's been a civilian variant of that that's been developed and used.
7 8 9 10 11 12 13 14 15 16	Q You're not allowed to carry a concealed rifle; correct?  A Correct. Q You're not allowed to carry a concealed shotgun; correct? A Correct. Q All right. I'm going to direct your attention to Exhibit 2. So this is your May 18, 2023, declaration, paragraph 26. You say, "L kewise, there are no objective	7 8 9 10 11 12 13 14 15	Q And in terms of how you went about identifying those particular features that you would consider associated with an AR-type firearm, how did you identify those particular features?  A Based on the designs that Stoner produced.  Q Would you consider an AR-10 an AR-type rifle?  A Similar, but different. It's Shares a lot of the same characteristics. But the AR-10 was typically a machine gun designed for the military. There's been a civilian variant of that that's been developed and used.  Q In your experience, as someone in the firearms
7 8 9 10 11 12 13 14 15 16 17	Q You're not allowed to carry a concealed rifle; correct?  A Correct. Q You're not allowed to carry a concealed shotgun; correct? A Correct. Q All right. I'm going to direct your attention to Exhibit 2. So this is your May 18, 2023, declaration, paragraph 26. You say, "L kewise, there are no objective standards to determine whether a given firearm is an	7 8 9 10 11 12 13 14 15 16	Q And in terms of how you went about identifying those particular features that you would consider associated with an AR-type firearm, how did you identify those particular features?  A Based on the designs that Stoner produced.  Q Would you consider an AR-10 an AR-type rifle?  A Similar, but different. It's Shares a lot of the same characteristics. But the AR-10 was typically a machine gun designed for the military. There's been a civilian variant of that that's been developed and used.  Q In your experience, as someone in the firearms industry, would you say that the AR-15 or the AR-10 is more
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7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q You're not allowed to carry a concealed rifle; correct?  A Correct. Q You're not allowed to carry a concealed shotgun; correct? A Correct. Q All right. I'm going to direct your attention to Exhibit 2. So this is your May 18, 2023, declaration, paragraph 26. You say, "L kewise, there are no objective standards to determine whether a given firearm is an AK-type, an AR-type or something else. In fact, even elicit examples are oftentimes not within the parameters of what even most firearms experts would consider to be an AK-type, I ke the SKS of an AR-type." That was your testimony?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q And in terms of how you went about identifying those particular features that you would consider associated with an AR-type firearm, how did you identify those particular features?  A Based on the designs that Stoner produced.  Q Would you consider an AR-10 an AR-type rifle?  A Similar, but different. It's Shares a lot of the same characteristics. But the AR-10 was typically a machine gun designed for the military. There's been a civilian variant of that that's been developed and used.  Q In your experience, as someone in the firearms industry, would you say that the AR-15 or the AR-10 is more popular among consumers?  A AR-15, with AR-10 being very close.  Q What is an AR pistol?  A An AR pistol would be an AR-15 that complies with the ATF's definitions of handgun.



Page 49 Page 51 Q Have you ever seen AR, just those two letters, 1 our industry. Tends -- It tends that with more knowledge 2 2 A-R, used to refer to a firearm? in the industry, more jargon is used, as in many industries. So I work to eliminate jargon as much as 3 Yes. 3 Did you understand what that meant? possible, but it doesn't always work. 4 I do, through my experience, but I've seen 5 Q Directing your attention to where it says many people be confused and refer to anything that is a 6 AR-15 build room. Directly under that, it says, "For \$40, 6 rifle that shares similar characteristics to be called an you can have access to our AR build room." 8 Do you see that? AR or even an AK. 9 Piasa Armory has a website; right? 9 Yes. 10 It does. 10 Did you write that sentence? 11 Q Who's respons ble for the content of that 11 I did. website? 12 12 Q And when you wrote that sentence, you had an 13 Α I am. 13 understanding of what AR meant? 14 Do you write it yourself? 14 I did, and especially because AR-15 build room 15 I do. 15 is written two lines above it. 16 I'm marking Deposition Exhibit 5. 16 And from the context, you can tell that AR 17 (Deposition Exhibit No. 5 marked for 17 means AR-15; is that fair to say? 18 Yes. identification.) Α 18 19 (By Mr. Wells) Do you recognize this document? 19 O You got to wait for me to finish. 20 20 Α What is it? 21 21 That was a yes. 22 This is an example of gunsmith services that 22 And what does AR refer to there? 23 In this case, it refers to AR-15. 23 we offer. 24 Q Would you agree that this appears to be a 24 What is your AR-15 -- I'm sorry. Let's strike 25 printout from the Piasa Armory website? 25 that. Page 50 Page 52 1 1 What is your AR build room? Α It is. 2 Q And do you see at the bottom left hand it says 2 A We don't have an AR build room. It's an AR-15 the URL for Piasa Armory? build room. As I mentioned, it was an example of jargon or Yes. 4 poor proofreading. Α 5 Q And it's specifically the gunsmith page? 5 Q But you call it an AR build room. Was that 6 6 Yes. just a shorthand? 7 Q Who's the audience for your website? 7 Δ Yes Any -- Anyone. So young, old, novice, 8 Q Do customers use the AR build room? 9 experienced, professional. Not lately. 10 Q Is it fair to say that the audience for your 10 Prior to January 10, 2023, did customers use 11 website is potential customers for Piasa Armory? 11 the AR build room? Yes. A It is, but also not potential customers. Our Α 12 12 13 business operates as education also. 13 What did they use the AR build room for? 14 A Typically installing parts and accessories. 14 Q And when you say education -- it operates as 15 education, what do you mean? 15 Or we would also offer to teach how to properly assemble an 16 A Educational I should say. So our goal, our 16 AR-15 so it would operate safely. company motto is creating a culture of responsible firearm 17 Q Did customers ever use the AR build room to 17 ownership, which is being willing to provide information to 18 assemble firearms other than an AR-15? anyone who asks, not just potential customers, helping to 19 A Typically not, but I'm sure that it's happened 20 teach safe handling, safe operation, and basic familiarity. 20 over the years. 21 Q When you write things on your website, do you 21 Q Do you recall any specific occasions where use terminology -- on the Piasa Armory website, do you use 22 22 someone assembled something other than AR-15? A I'm sure that someone has assembled a Glock 23 23 terminology that you believe your customers will 24 understand? 24 pistol or other similar pistols. 25 25 A I work to -- Jargon is a difficult thing in Q Has a customer ever built an AR-7 in your AR



		Scott F	Pula	laski
1	build roc	Page 53 pm?	1	Page 5t I of 2022, did you have an understanding as to what AR-type
2	Α	That would be rather difficult.	2	2 firearms meant?
3	Q	Is that a no?	3	A As a member of the industry with experience, I
4	Α	That To my knowledge, no.	4	1 do.
5	Q	How about an AR-5? Has a customer ever used	5	Q And this was a document that you reviewed that
6	an AR	your AR build room to construct an AR-5?	6	came from ATF; is that right?
7	Α	Not to my knowledge.	7	7 A Yes.
8	Q	And the reason you offered, prior to	8	Q And when you're reviewing documents from ATF,
9	January	10, 2023, an AR build room is because the AR-15 is	9	they regulate firearms; right?
10	very cor	mmon; right?	10	0 A They do.
11	Α	It is.	11	1 Q So they use firearms terminology that
12	Q	All right. I'm going to show you set that	12	2 regulated entities will understand?
13	one to t	he side.	13	3 A Traditionally.
14		(Deposition Exhibit No. 6 marked for	14	Q In the spring of 2022, when you got Deposition
15	identific	eation.)	15	5 Exhibit 6, did you reach out to ATF seeking clarification
16	Q	(By Mr. Wells) I'm handing you what I'm	16	6 as to what they meant about AR-type firearms?
17	marking	g as Deposition Exhibit No. 6. Are you familiar with	17	7 A I did not, as I understood what they meant by
18	this doc	cument?	18	8 AR-type firearms. Fires that use the fire control group o
19	Α	I am.	19	
20	Q	How are you familiar with it?	20	0 Q What is a fire control group?
21	Α	This was provided to all FFL's by the ATF.	21	- · · · · · · · · · · · · · · · · · · ·
22	Q	And you reviewed it in your capacity as an	22	
23	owner c	of Piasa Armory; is that right?	23	
24		l did.	24	4 Q (By Mr. Wells) All right. I'm going to hand
25	Q	And you reviewed it when ATF issued it?	25	
		Day 54		Days 5
1	Α	Yes.	1	Page 50
2	Q	And it says, "March 22nd, 2022, open letter to	2	2 A Thank you.
3	all federa	al firearms licensees."	3	MR. MAAG: Thank you.
4	;	So you reviewed it approximately in March of	4	Q (By Mr. Wells) Do you recognize what I've
5	2022; is	that fair to say?	5	marked as Deposition Exhibit No. 7?
6	Α	On or about that.	6	6 A I do.
7	Q	March, April?	7	Q What is it?
8	Α	Yes.	8	A This is the federal definition of a frame or
9	Q	Around the spring of 2022?	9	receiver.
10	Α	Yes.	10	Q What is a frame or receiver in your own words?
11	Q	I'm directing your attention to the second	11	1 A That'd be the component of a firearm that
12	paragra	ph. You see it says FRT?	12	2 contains the working parts of the firearm.
13	Α	Yes.	13	3 Q Directing your attention to paragraph two on
14	Q	Do you have an understanding of what FRT means	14	4 Deposition Exhibit 7, the first page. Do you see it says,
15	in that s	sentence?	15	5 "The term receiver means the part of a rifle, shotgun or
16	Α	I do.	16	6 projectile weapon other than a handgun or variance thereo
17	Q	What is that?	17	7 that provides housing or a structure for the primary
18	Α	That is a forced reset trigger.	18	8 component designed to block or seal the breach prior to
19	Q	So in paragraph two of Deposition Exhibit 6,	19	9 initiation of the firing sequence, i.e., bolt, breach lock
10		"These particular FRTs," meaning forced reset	20	0 or equivalent, even if pins or other attachments are
20	it says,	mode particular ritro, moderning forced recet		
	-	, "are being marketed as replacement triggers for	21	
20	triggers			1 required to connect to such component to the housing or
20 21	triggers	, "are being marketed as replacement triggers for	21	1 required to connect to such component to the housing or 2 structure?"
20 21 22	triggers AR-type	, "are being marketed as replacement triggers for e firearms."	21 22	<ul> <li>1 required to connect to such component to the housing or</li> <li>2 structure?"</li> <li>3 A I do.</li> </ul>
20 21 22 23	triggers AR-type	, "are being marketed as replacement triggers for e firearms."  Do you see that?	21 22 <b>23</b>	1 required to connect to such component to the housing or 2 structure?" 3 A I do. 4 MR. MAAG: I'm going to interpose an

	Scott I	Pulaski
1	Page 57 Circuit has stayed the implementation of these rules.	Page 59 1 (Deposition Exhibit No. 8 marked for
2	MR. WELLS: Are we in the Fifth Circuit?	2 identification.)
3	MR. MAAG: No, but I think it's a nationwide	3 Q (By Mr. Wells) I'm handing you what I've
4	injunction.	4 marked as Deposition Exhibit 8, which I can represent to
5	MR. WELLS: Is it? Okay. All right.	5 you is an excerpt, so a collection of pages from Shooter's
6	MR. MAAG: I mean, you can proceed. I just	6 Bible Guide to AR-15, 2nd Edition.
7	want	7 A Okay.
8	MR. WELLS: Right. Fair enough.	8 Q I'm directing your attention to the last page.
9	Q (By Mr. Wells) With respect to paragraph	9 MR. MAAG: Printed in China.
10	three, do you see where it says the terms variant and	10 Q (By Mr. Wells) Are you familiar with Doug
11	variance thereof?	11 Howlett?
12	A I do.	12 A Not personally, but as a writer, yes.
13	Q And do you understand what's meant by variant?	13 Q So you're familiar with his writing?
14	A I do.	14 A Yes.
15	Q Do you see in paragraph three where it says,	15 Q And it says here that he worked as an editor
16	"For example, an AK-type firearm with a short stock, i.e.,	16 of American Hunter magazine. Are you familiar with that
17	pistol grip, is a pistol variant of an AK-type rifle. An	17 magazine?
18	AR-type firearm with a short stock, i.e., pistol grip, is a	18 A I am.
19	pistol variant of an AR-type rifle. And a revolving	19 Q And is it a good source of information about
20	cylinder shotgun is a shotgun variant of a revolver."	20 firearms?
21	Do you see that sentence?	21 A I have not read American Hunter magazine as
22	A I do.	22 referential material.
23	Q And do you understand the use of the phrase	23 Q It says here Rob Manning is another one of the
24	AR-type firearm in that?	24 authors, and he's the current editor, at least as of this
25	A Thanks to my experience in in the industry,	25 publication date, of Gun World magazine. Are you familiar
	Page 58	
- 1		Page 60
	yes, I do.	1 with Gun World magazine?
2	yes, I do.  Q And do you understand what AK-type firearm	1 with Gun World magazine?  2 A I am.
3	yes, I do.  Q And do you understand what AK-type firearm means in that?	<ul> <li>1 with Gun World magazine?</li> <li>2 A I am.</li> <li>3 Q Is that a good source of information about</li> </ul>
2 3 4	yes, I do.  Q And do you understand what AK-type firearm means in that?  A Again, thanks to my experience in the	<ul> <li>1 with Gun World magazine?</li> <li>2 A I am.</li> <li>3 Q Is that a good source of information about</li> <li>4 firearms?</li> </ul>
2 3 4 5	yes, I do.  Q And do you understand what AK-type firearm means in that?  A Again, thanks to my experience in the industry, I do.	<ul> <li>1 with Gun World magazine?</li> <li>2 A I am.</li> <li>3 Q Is that a good source of information about</li> <li>4 firearms?</li> <li>5 A It can be.</li> </ul>
2 3 4 5 6	yes, I do.  Q And do you understand what AK-type firearm means in that?  A Again, thanks to my experience in the industry, I do.  Q And I can represent to you that 27 CFR Section	<ul> <li>with Gun World magazine?</li> <li>A I am.</li> <li>Q Is that a good source of information about</li> <li>firearms?</li> <li>A It can be.</li> <li>Q I'm directing your attention to the second</li> </ul>
2 3 4 5 6 7	yes, I do.  Q And do you understand what AK-type firearm means in that?  A Again, thanks to my experience in the industry, I do.  Q And I can represent to you that 27 CFR Section 478.12, which is Deposition Exh bit 7, which we've been	<ul> <li>with Gun World magazine?</li> <li>A I am.</li> <li>Q Is that a good source of information about</li> <li>firearms?</li> <li>A It can be.</li> <li>Q I'm directing your attention to the second</li> <li>paragraph on this page. It says, "In this complete book of</li> </ul>
2 3 4 5 6 7 8	yes, I do.  Q And do you understand what AK-type firearm means in that?  A Again, thanks to my experience in the industry, I do.  Q And I can represent to you that 27 CFR Section 478.12, which is Deposition Exh bit 7, which we've been looking at, it took effect in August August 24th of	<ul> <li>with Gun World magazine?</li> <li>A I am.</li> <li>Q Is that a good source of information about</li> <li>firearms?</li> <li>A It can be.</li> <li>Q I'm directing your attention to the second</li> <li>paragraph on this page. It says, "In this complete book of</li> <li>AR style firearms, you can peruse the products of all</li> </ul>
2 3 4 5 6 7 8 9	yes, I do.  Q And do you understand what AK-type firearm means in that?  A Again, thanks to my experience in the industry, I do.  Q And I can represent to you that 27 CFR Section 478.12, which is Deposition Exh bit 7, which we've been looking at, it took effect in August August 24th of 2022. And at Piasa Armory, you would have complied with	<ul> <li>with Gun World magazine?</li> <li>A I am.</li> <li>Q Is that a good source of information about</li> <li>firearms?</li> <li>A It can be.</li> <li>Q I'm directing your attention to the second</li> <li>paragraph on this page. It says, "In this complete book of</li> <li>AR style firearms, you can peruse the products of all</li> <li>manufacturers, learn about the evolution of the AR from its</li> </ul>
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	Scott	Pula	INCE
1	Page 61 roughly, Eugene Stoner was involved with the design of the	1	Page 63 undoubtedly the most comprehensive listing of current AR
2	AR-15?	2	style rifle models available in print or on the web,
3	A Yes.	3	though, it is by no means exhaustive."
4	Q And the AR-15 became the M-16; is that right?	4	Do you see that?
5	A It did. It also became a Colt firearm that	5	A I do.
6	was sold to the civilian market.	6	Q And do you understand what AR style rifle
7	Q What's the difference between the civilian	7	models means in this sentence?
8	Colt firearm that's an AR-15 and the military AR-15 that	8	A I do. Again, thanks to my industry knowledge
9	was named the M-16?	9	and the title of the book.
10	A The M-16 is a select-fire firearm machine gun,	10	Q And directing your attention to the last
11	so it's able to fire more than one projectile when pulling	11	sentence in this paragraph that starts with "and."
12	the trigger.	12	"And admittedly, with so many small gunmakers
13	Q Any other differences?	13	coming into the fold and just as quickly falling back out
14	A On the outside, no, but definitionally, that's	14	of it, capturing every manufacturer is a target even a
15	what makes the difference.	15	custom built AR couldn't hit."
16	Q And any other differences relate to that	16	Do you see that?
17	effectuating that difference between select fire and	17	
18	semi-automatic fire; is that right?	18	Q Do you have an understanding of what custom
19	A Minor differences by the manufacturer, yes.	19	built AR means here?
20	Things that would prevent somebody from easily converting a	20	A I do.
21	civilian AR-15 into an M-16.	21	Q What is that understanding?
22	Q But to the extent that there are differences	22	A That would refer to somebody who builds a
23		23	· · · · · · · · · · · · · · · · · · ·
24	A They	24	Q In the first sentence that we looked at just a
25	Q Let me just finish.	25	second ago, the author stated, "It's by no means an
	Page 62		Page 64
	The differences would relate to engine the	1	expensive list of AD rifle models."
1	The differences would relate to, again, the	1	exhaustive list of AR rifle models."
2	internal mechanisms that either facilitate, in the case of	2	exhaustive list of AR rifle models."  Do you agree that it would be very difficult
2 3	internal mechanisms that either facilitate, in the case of an M-16, automatic fire or aren't there in a semi-automatic	2	exhaustive list of AR rifle models."  Do you agree that it would be very difficult to make an exhaustive list of all AR style rifle models?
2 3 4	internal mechanisms that either facilitate, in the case of an M-16, automatic fire or aren't there in a semi-automatic civilian version; is that correct?	2 3 4	exhaustive list of AR rifle models."  Do you agree that it would be very difficult to make an exhaustive list of all AR style rifle models?  A I do.
2 3 4 5	internal mechanisms that either facilitate, in the case of an M-16, automatic fire or aren't there in a semi-automatic civilian version; is that correct?  A Correct. And minor cosmetic details.	2 3 4 5	exhaustive list of AR rifle models."  Do you agree that it would be very difficult to make an exhaustive list of all AR style rifle models?  A I do.  Q Do you agree that it would be possible to make
2 3 4 5 6	internal mechanisms that either facilitate, in the case of an M-16, automatic fire or aren't there in a semi-automatic civilian version; is that correct?  A Correct. And minor cosmetic details.  Q All right. So sticking with this exhibit,	2 3 4 5 6	exhaustive list of AR rifle models."  Do you agree that it would be very difficult to make an exhaustive list of all AR style rifle models?  A I do.  Q Do you agree that it would be possible to make a large, but not necessarily complete, list of AR style
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	Scott I	Pula	aski
1	Page 65 Q And there are 141, based on my count, AR	1	Page 67 MR. WELLS: True.
	manufacturers identified here. You said not anywhere near	2	MR. MAAG: Thank you.
3	complete. Why do you say that?	3	MR. WELLS: They used to write on sheepskin.
4	A Because of the nature of firearms	4	MR. MAAG: Well, I never did.
5	manufacturing and the nature of the AR-15 manufacturing.	5	MR. WELLS: Me either.
6	For example, ourselves, we don't physically	6	Q (By Mr. Wells) All right. I have marked for
7	manufacture our own. We use a process called a variance to	7	identification purposes Deposition Exhibit 9, which I can
8	produce our AR-15 lower, half of the receiver system for	8	represent to you is a printout from the Illinois General
9	the AR-15. So without intimate industry knowledge, no one	9	Assembly website of 720 ILCS 5/24-1.9.
	could compile such an exhaustive list.	10	
11	Q You said variance?	11	.,
12		12	
13		13	, <b>, ,</b>
14		14	
15	Q How many AR-15s does prior to So let's	15	
16		16	
17		17	
18		18	
19	Q Do you know who the largest AR-15 manufacturer	19	
20	•	20	· -
21	A Not immediately, but with a short search, I'm	21	
22	•	22	
23	Q Who do you What are the companies that you	23	, , , , , , , , , , , , , , , , , , ,
24		24	
25			to review all of the models that are listed under J, small
-0	The initioalatory i would day i almosto otato famoryi	25	to review all of the models that are listed direct 5, small
1	Page 66  O Any others?	1	Page 68 Roman two, which it goes from one to 43 on the next page
1 2	Q Any others?	1 2	Roman two, which it goes from one to 43 on the next page
2	Q Any others?  A Aero Precision. A-E-R-O.	1 <b>2</b> 3	Roman two, which it goes from one to 43 on the next page  A Uh-huh (yes).
<b>2</b> 3	<ul><li>Q Any others?</li><li>A Aero Precision. A-E-R-O.</li><li>Q Do you have any sense of how many AR-15s</li></ul>	2	Roman two, which it goes from one to 43 on the next page  A Uh-huh (yes).  Q and tell me which of the models that are on
<b>2</b> 3 4	Q Any others?  A Aero Precision. A-E-R-O.	3	Roman two, which it goes from one to 43 on the next page  A Uh-huh (yes).  Q and tell me which of the models that are on this list you do not believe are probably properly
2 3 4 5	Q Any others?  A Aero Precision. A-E-R-O. Q Do you have any sense of how many AR-15s Palmetto State Armory produces in a given year?  A I do not.	<b>2</b> 3 4	Roman two, which it goes from one to 43 on the next page  A Uh-huh (yes).  Q and tell me which of the models that are on this list you do not believe are probably properly characterized as an AR-type.
2 3 4 5 6	Q Any others?  A Aero Precision. A-E-R-O.  Q Do you have any sense of how many AR-15s  Palmetto State Armory produces in a given year?  A I do not.  Q Is it more than 150?	<b>2</b> 3 4 5	Roman two, which it goes from one to 43 on the next page  A Uh-huh (yes).  Q and tell me which of the models that are on this list you do not believe are probably properly characterized as an AR-type.  A The AR-10, again, is similar, but that would
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2 3 4 5 6 7 8	Q Any others?  A Aero Precision. A-E-R-O. Q Do you have any sense of how many AR-15s  Palmetto State Armory produces in a given year?  A I do not. Q Is it more than 150?  A Absolutely. Q Do you think it's in the tens of thousands?	2 3 4 5 6 7	Roman two, which it goes from one to 43 on the next page  A Uh-huh (yes).  Q and tell me which of the models that are on this list you do not believe are probably properly characterized as an AR-type.  A The AR-10, again, is similar, but that would be a a different type of system. It operates similarly to an AR-15, but it's larger, different caliber. It has
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Page 71 Page 69 We're going to go back and forth with this one a little 1 A I do. 2 2 bit, so keep it handy. Q Do you agree that that rifle has a flash 3 I want you to go back to your May 19th 3 suppressor? declaration, so that's Exhibit 2. And I'm going to direct 4 A This one does. your attention to paragraph 21 where you say that, 5 Do you agree that the rifle depicted on "ArmaLite M-15 .22 LR carbine is designed to look like an 6 page 28 next to ArmaLite M-15 .22 LR carbine -- carbine has 6 early prototype AR-15, circa about 1964, by is in" -- I a barrel shroud? A I would not call that a barrel shroud. I think you meant "but is in." 8 9 A Correct. 9 would call it a hand guard. It's simply meant to protect 10 "A different caliber, has no gas system and 10 the barrel so the user doesn't burn themselves while 11 completely different operating system and uses different 11 shooting, similar to many other semi-automatic and 12 bolt-action rifles. 12 magazines." 13 That was your testimony; is that right? 13 Q And you're referring to the -- I guess you 14 14 can't really see the -- the color here. But to shield the 15 I'm going to hand you what I'm going to mark second hand of the user from touching the barrel; is that 16 as Deposition Exhibit 10. 16 right? 17 17 (Deposition Exhibit No. 10 marked for Δ Correct. Correct. 18 identification.) Because the barrel gets hot? 18 19 (By Mr. Wells) Have you seen this document? 19 It's the case with every firearm that's fired. 20 20 And are you familiar with -- in Deposition Exh bit 9, which is the provision of PICA, the definition 21 What is it? 21 22 This is the Assault Weapon Identification 22 of assault weapon that uses features? 23 23 Guide, and it was put together by the state police. Yes. 24 Q I'm going to direct your attention to -- Well, 24 Would you agree that the firearm we were just looking at in Deposition Exhibit 10, the top of page 28, 25 let me ask you this: This Assault Weapon Identification Page 70 Page 72 Guide, is this something that you've looked at and -- for 1 the ArmaLite M-15 .22 LR carbine, it has features that are 2 purposes of running Piasa Armory? 2 listed under Section 1.9 (a)1(A?) It does. 3 Yes. 3 Directing your attention to page 28, top of 4 4 You mentioned in your declaration from May 19, the page next to ArmaLite M-15 .22 LR carbine. Do you 2023, in paragraph 21, that the ArmaLite M-15 .22 LR recognize that photograph? 6 carbine uses different magazines. What do you mean? 6 7 I do. 7 A The magazine for the M-15 .22 carbine is only Α 8 And what is that? 8 capable of accepting 22 long rifle ammunition, rather than q That's an ArmaLite M-15 .22 LR carbine. 9 a 223 or 556 ammunition that's common for the AR-15 rifle. 10 Why do you believe an ArmaLite M-15 .22 LR 10 So the cal ber of ammunition for the M-15 .22 LR is different than the caliber of ammunition used in most 11 carbine is not an AR-type? 11 12 AR-15 models? 12 A Shares cosmetic similarities, but in the same 13 way that a Ruger 10/22, which is pictured also in this 13 A Correct. document, is not the -- is -- is just dressed up 14 Q And in order for a magazine to be able to be differently than the tactical model that's pictured in this 15 interchangeable, you need to have the same caliber of 15 16 document. So the internals are different. 16 ammunition between the two firearms that you're planning to Q Do you agree that the rifle depicted on page use that magazine in; is that fair to say? 17 17 28 of Deposition Exhibit 10 next to ArmaLite M-15 .22 LR 18 18 Α Not necessarily. 19 carbine is a semi-automatic rifle? 19 Q Why not? 20 Modern AR-15s are capable of accepting dozens 20 Yes. 21 Do you agree that that same rifle has a 21 of different calibers of ammunition. Some of those share the same magazines with 223. For example, 50 Beowulf for 22 detachable magazine? 22 23 23 58 SOCOM -- 458 SOCOM uses a standard 223 magazine. I do. 24 Q So there are multiple calibers that can fit 24 Do you agree that that rifle has a pistol 25 grip? 25 into one magazine; is that fair to say?



5 (	Scott	Pula	aski
1	Page 73  A Correct.	1	Page 75 Q Do you agree that the Beretta AR-70 has a
2	Q You do have to have at least one overlapping	2	pistol grip?
3	caliber between two firearms to be able to use the same	3	A I do.
4	magazine, though; right?	4	Q Do you agree that the Beretta AR-70 is Is
5	A In general.	5	there a semi-automatic version of the Beretta AR-70?
6	Q Is that a yes?	6	A I am sure that there are some automatic
7	A Yes.		conversions that have been done on that, but for genera
8	Q All right. Let's go back to your declaration	8	consumption, it was not produced for the civilian market
9	paragraph, paragraph 22. This is the May 19 declaration,	9	Q So it was not produced for the civilian market
10		10	•
11	In paragraph 22, you mentioned the Beretta	11	A Correct. Which would be banned by Illinois
12			
		13	
13 14		14	1
		15	
15 16		16	
17	•	17	
18		18	
19		19	
20	•	20	
21	sorry. The Beretta AR-70 is one of the models listed under	21	<ul><li>A It appears to.</li><li>Q And that's one of the prohibitive</li></ul>
22		22	
23		23	-
23 24		24	
25		25	, ,
	Page 74		Page 7
1	a fully automatic rifle issued to the Italian military?	1	listed in PICA under subsection 1.9 (a)(1)(A)?
2	A Yes.	2	A It does, in similar manner to other rifles.
3	Q Does the AR-70 use the same caliber of	3	Q And you also mentioned that most of the AR-70
4	ammunition as the AR-15 chambered in 5.56 NATO?	4	produced were fully automatic firearms; right?
5	A Yes.	5	A Right.
6	Q The AR-70 was designed by Beretta, an Italian	6	Q Directing your attention to paragraph 23 of
7	company; right?	7	your declaration. So we're going back to Exhibit 2. In
8	A To my knowledge, yes.	8	there, you wrote, "There is no such gun as the Rock Rive
9	Q To your knowledge?	9	Arms AR-47, but if that is intended to refer to the LAR-47
10	A Yes.	10	again, there are substantial differences, including
11	Q And the The Beretta AR-70 was not based on	11	caliber, magazine used and general appearance."
12	Eugene Stoner's original AR-15 design by ArmaLite?	12	That was your testimony?
13	•	13	A Yes.
14	manufacturers, but I would presume no.	14	Q Would you agree that the LAR-47 is an AK-47
15	Q What is AR and AR-70 mean?	15	type rifle?
16	A I do not recall that.	16	A I would not.
17	Q Is the AR-70 still in production, to your	17	Q How would you characterize the LAR-47?
18	knowledge?	18	A I would characterize it as a derivative of the
19	A Not for civilian consumption and not for	19	AR-15, designed to take AR-47 style magazines.
20	military consumption, to my knowledge.	20	Q When you say it's a derivative of the AR-15,
21	Q All right. I'm going to direct your attention	21	what do you mean?
22	back to the ISP guide. So that's Deposition Exhibit 10.	22	A I mean that it was inspired by, takes design
23	Bottom of page 28 where it says Beretta AR-70 with flash	23	elements from, but is not is not the same firearm.
24	suppressor. Do you see that?	24	Q Why not?
٥E	A Vaa	25	A It uses different megazines uses different



It uses different magazines, uses different

25

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A Yes.

25

Α

Page 77 Page 79 calibers, different receiver styles. 1 by the shooter. A flash oppressor is designed to mitigate 2 2 flash seen by the shooter. You said that the LAR-47 takes the AR-15 and 3 changes the caliber, the magazine, and changes it in a way 3 Q Do you agree that the LAR-47 has a barrel that's towards like AK-47 caliber? shroud as depicted in Deposition Exh bit 11? 5 Α Correct. 5 A Again, I would consider that a hand guard Do you think the LAR-47 could be characterized meant to prevent the user from burning themselves while 6 Q 6 as an AK-type firearm? shooting. A barrel shroud, other than PICA, to my A I don't. 8 8 knowledge, doesn't have a solid definition. 9 Why not? 9 Do you agree that the rifle depicted in 10 Because it's not an AK-type firearm based on 10 Deposition Exhibit 11 has a telescoping or adjustable 11 the Kalashnikov design. 11 stock? 12 12 Q Would you agree that the LAR-47 takes design Α It appears to. 13 elements from both the AK-47 and the AR-15? 13 Q Would you agree that the rifle depicted in Deposition Exhibit 11 would qualify as an assault weapon 14 I would. 14 15 So would you characterize the LAR-47 as a bit 15 under the features-based definition in PICA? 16 16 of a hybrid between an AK-47 and the AR-15? Α Yes. 17 A That's reasonable, yes. 17 Q I'm going to direct your attention back to the ISP guide, so Deposition Exhibit 10. Directing your 18 Q I'm going to direct your attention to an 18 19 exhibit that I'm going to mark as Exhibit 11. 19 attention to page 39, do you see where it says Anderson AM-15 BR? 20 (Deposition Exh bit No. 11 marked for 20 21 A I do. 21 identification.) 22 Q (By Mr. Wells) Do you recognize this document? 22 Q And that's listed under other, quote, AR-type, 23 close quote, rifles as defined by the Protecting Illinois A I have not seen it before today, but I 23 24 recognize it as Rock River Arms' website. 24 Communities Act. Do you see that? 25 25 A I do. So I can represent to you it's a screen shot Page 80 Page 78 of Rock River Arms' website specifically relating to the Q Would you agree that the Anderson AM-15 BR is LAR-47? 2 an AR-type rifle? 3 Α Yes. 3 A Yes. AR-15 type rifle. 4 Do you see the URL listed up there that says 4 Q Directing your attention to the next rifle 5 RockRiverArms.com? underneath that, next to Ruger AR 556 MPR with M-Lok rail. 6 Do you recognize the firearm depicted immediately to the 6 Α I do. 7 Do you agree that the firearm depicted in 7 right of that language as a Ruger AR-50 -- 56 MPR? 8 Deposition Exhibit 11 is an LAR-47? 8 I do. 9 Α I would agree. g Would you agree that that's an AR-type rifle? 10 That's an AR-15 type rifle, yes. 10 Do you agree that this is a semi-automatic 11 rifle? 11 And in the Ruger name, Ruger AR-556, what do you understand the 556 to refer to? 12 A It appears to be, yes. 12 13 The typical caliber that it is sold in. So 13 Do you agree that the rifle depicted in Α 14 5.56 NATO. 14 Deposition Exhibit 11 has a detachable magazine? And even though Ruger is calling it a Ruger 15 A It does. 15 16 AR-556, you still recognize it to be an AR-15 type rifle? 16 And do you agree that the rifle depicted in Deposition Exhibit 11 has a pistol grip? 17 A I do. 17 18 A It does. 18 Directing your attention to the next firearm Do you agree that the rifle depicted in depicted next to the language "Springfield Armory SAINT 19 Victor." Do you see that? 20 Deposition Exhibit 11 has a flash suppressor? 20 21 21 Α I do. A It appears to have a compensator, not a flash 22 22 suppressor. O Do you agree that that's an AR-type rifle? What's the difference between a compensator 23 23 Α AR-15 type, yes. 24 Directing your attention to the next firearm 24 and a flash suppressor? Q 25 A compensator's made to mitigate recoil felt 25 depicted on page 39 next to Radical Firearms, RF-15 SOCOM.



	Scot	t Pulaski
1	Page 8 Do you recognize that rifle?	Page 83 1 Do you understand what's meant here by ARs?
2	A I do.	2 A I do. AR-15s.
3	Q Do you recognize it as a Radical Firearms	3 Q Do you agree with what this these couple of
4	RF-15 SOCOM?	4 sentences say?
5	A Radical Firearms is a wide product variety,	5 A Yes.
6	product offering in many variants, but it looks like one	of 6 Q And how do you understand what's being
7	their firearm styles, yes.	7 described here?
8	Q Would you agree that the firearm depicted at	8 A This That there are many variants of the
9	the bottom of page 39 next to Radical Firearms is an AR-15	9 AR-15 that are produced under different names by different
10	A It appears to be, yes.	10 manufacturers, but are substantially similar.
11	Q Would you at call it an AR-type rifle?	11 Q And did it always Has it always been the
12	A I would call it an AR-15 type rifle, yes.	12 case that there are a lot of AR-15 manufacturers?
13		13 A From my time in firearms, yes. However, I
14		14 was My time in firearms began after the sunset of the
15	you to tell me whether the rifles depicted on those pages	15 Clinton assault weapons ban.
16		16 Q So there was a period of time when most gun
17	•	17 shops would carry two or three AR-type rifles; is that
18		18 right?
19		19 A Correct. Twenty-plus years ago.
20		20 Q How many different types of AR-rifles do you
21	all of those rifles depicted are AR-15 type rifles;	21 carry at Piasa Armory?
22		22 A As many as are manufactured and supplied by
23		23 our distributors.
24		24 Q Do you have any idea of the number of
25		25 manufacturers of AR-15s that you offer at Piasa?
		,
	Page 8	Page 84
1	A Of the Stoner design, yes.	1 A I would assume in the neighborhood of 50.
1 2		
	A Of the Stoner design, yes.	1 A I would assume in the neighborhood of 50.
2	<ul><li>A Of the Stoner design, yes.</li><li>Q All right. One more on ARs and then</li></ul>	<ul> <li>A I would assume in the neighborhood of 50.</li> <li>Q Okay. Why don't we take a short break.</li> </ul>
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 33	A Of the Stoner design, yes.  Q All right. One more on ARs and then A Okay.  Q We're not done yet. A Sure. Q If you need a break, too, by the way, just let me know. (Deposition Exhibit No. 12 marked for identification.) Q (By Mr. Wells) I'm going to show you what I'm marking as Deposition Exhibit 12. MR. MAAG: Thank you. Q (By Mr. Wells) You mentioned earlier that you have been to Pew Pew Tactical's website; is that right? A Yes. Q I can represent to you that these are screen shots from Pew Pew Tactical's website. Let me direct you attention to the second page. Do you see where it says, "The Modern AR-15?" A I do. Q Do you see underneath that it says, "It used to be really easy. Head down to your local gun shop and choose from the two or three ARs they have on the shelf, but those days are long gone. Now you're bombarded with	1 A I would assume in the neighborhood of 50. 2 Q Okay. Why don't we take a short break. 3 A Sure. 4 THE VIDEOGRAPHER: This is the videographer. 5 We are going off the record. The time now is 3:42. 6 (Whereupon, a short break was taken.) 7 THE VIDEOGRAPHER: This is the videographer. 8 We are back on the record. The time now is 3:49. 9 Q (By Mr. Wells) Mr. Pulaski, I'd I ke to direct 10 your attention back to your May 18th declaration, 11 paragraph 26. In paragraph 12 MR. MAAG: Which paragraph? 13 MR. WELLS: Twenty-six. 14 Q (By Mr. Wells) In paragraph 26, you wrote, 15 "L kewise, there are no objective standards to determine 16 whether a given firearm is an AK-type, an AR-type or 17 something else. In fact, even the listed examples are 18 oftentimes not within the parameters of what even most 19 firearms experts would consider to be an AK-type like the 20 SKS or an AR-type." 21 I switched that "of" to an "or" because it was 22 a typo; right? 23 A Correct.

	Page 8	Pula	ASKI Page 87
1	A I do.	1	design select fire shoulder-fired weapon that under federa
2	Q In your mind, what are the parameters that	2	law would be a machine gun.
3	most firearms experts would consider to be an AK-type?	3	So the original AK-47 would be a machine gun
4	A Those would be of the design of the original	4	under federal law because it's fully automatic?
5	AK-47 designed by Kalashnikov. So basically, a civilian	5	A And select fire, yes.
6	semi-automatic variant of the military fully automatic	6	Q You agree there is such a thing as the AK
7	AK-47.	7	series of rifles; correct?
8	Q What does AK stand for?	8	A There is an entire collection in family of
9	A Automatic Kalashnikov.	9	firearms based on the AK-47 design.
10	Q What language is that?	10	Q Would you agree that the AK-47 is one of the
11	A Russian.	11	most famous weapons in the world?
12	Q What does the Avtomat mean?	12	A It is.
13	A Automatic.	13	Q And there have been many, tens of millions, of
14	Q And what does Kalashnikov mean?	14	
15	A Rifle designed by Kalashnikov, basically.	15	·
16	Q And who is Kalashnikov?	16	
17	A Kalashnikov was a Russian military tanker,	17	Q So I'm going to read you a statement, and I
18		18	
19		19	"After more than seven decades since its
20	•	20	
21	_	21	the most popular and widely used firearms in the world."
22		22	
23		23	
24		24	
25			AK-47?
1	that?	1	Page 88 A I own a Romanian WASR-10.
2	A They were designing rifles at the same time,	2	Q But you consider the Romanian WASR-10 to be an
3	or similar time, attempting to have their designs adopted	3	AK-47?
4	by the Russian military as a whole.	4	A To somebody who doesn't have experience with
5	Q What does the AK What does the 47 refer to	5	firearms, they would say it was an AK variant. However,
6	in AK-47?	6	it's an AKM, which is similar to the AR-15 versus the M-16
7	A The year that the design was adopted.	7	It's cosmetically similar, but different.
8	Q I'm directing your attention to paragraph 13	8	Q What does AKM stand for?
9	of your May declaration. In paragraph 13, you wrote, "As	9	A I do not recall the M at this time.
10	to the named firearms in the Illinois ban, as I previously	10	Q What do the AK in AKM stand for?
11	stated, I'm familiar with both the AK or Soviet Avtomat."	11	A Typically, it stands for Avtomat Kalashnikov.
12	MR. MAAG: Avtomat.	12	Q Same thing as Same meaning as an AK-47; is
13	Q (By Mr. Wells) You meant Avtomat there; is	13	that right?
14	that right?	14	A Correct.
15	MR. MAAG: Well, Avtomat is how it's	15	Q What is an AK-74?
16	pronounced.	16	A AK-74 is a modern redesign of the AK-47, which
17	Q (By Mr. Wells) But it's spelled A-V-T-O.	17	is part of the AK family. It uses different ammunition.
18		18	Q You say different ammunition. What do you
19		19	mean?
20	· ·	20	
21		21	uses 545 by 39. It's a Soviet attempt to have a similar
22		22	military round to the United States.
		23	Q In the name AK-74, what does the AK?
23	_ (=)	_3	
23 <b>24</b>	A Missing the S in there. Yes	24	A Avtomat Kalashnikov.
23 <b>24</b> 25	•	<b>24</b> 25	<ul><li>A Avtomat Kalashnikov.</li><li>Q What does 74 mean in AK 74?</li></ul>



Page 89 Page 91 A That would be the year that it was adopted for A I don't recall. Specifically, the SKS and --2 wide use in the military. 2 but the AK variant was not a focus necessarily as much as 3 the SKS was. 3 Q And was Kalashn kov the same person who 4 designed the AK-47 also the person who designed the AK-74? 4 Q What has changed between when you prepared 5 I don't recall, but I presume that it was. 5 your two sworn statements and today where now you're adding 6 What is an AK-56? additional firearms that you didn't identify in your 6 7 Δ I don't recall 7 declaration that you don't believe are properly 8 Q Do you know what a type 56 rifle is? 8 characterized as AK-types? 9 I'd say a Chinese variant of the Kalashnikov 9 A The AK-types are not -- I'm thinking of how to 10 desian. 10 phrase this properly. Sorry. Again, it's similar to AR -- AR-15s and 11 When you say variant, what do you mean? 11 12 The Chinese are famous for copying designs of M-16's, the AK-types, the -- the original manufactured 12 13 Russian firearms, vehicles, any other equipment, and making 13 design for Kalashnikov, the military variant, is what's them for their military with changes that are suitable for typically referred to as the AK or the AK-47, but those their military. 15 15 variants are similar. But civilian market variants, the Q I'm going to direct your attention back to 16 16 AR-15 versus the M-16. 17 Section 1.9 --17 Q So are the ones that you identified, like the 18 Α Okay. MAK90, are those -- is that available in the civilian 18 19 Q -- of PICA provisions. So Deposition 19 market in the United States? 20 Exhibit 9. We're going to go to page two, capital J, 20 A Not in this state anymore. The AK-90 was 21 little I. 21 available minorly, but not widely in just one of the many 22 Uh-huh (yes). 22 variants was out there. 23 Where it says, "All AK types." Do you see 23 What does MAK stand for and MAK90? 24 24 that? Δ I don't recall. 25 25 Does the AK stand for Avtomat Kalashnikov? Α Yes. Page 90 Page 92 1 Q And then under the little I, there is Roman A One could presume that. 2 numerals one through six. Do you see that? 2 Q And you said it wasn't a big presence here in 3 Yes. 3 the United States or something like that. What did you 4 Q And under Roman numeral one, there are several 4 mean? 5 numbers and letters listed. I want you to look at Roman --5 A Typically, items like the WASR-10, which were capital Roman numeral one through six, and tell me which of 6 6 brought over in kit form and produced by a major manufacturer, were the prevalent variant of the AK-47, copy 7 the firearms listed here you don't think -- or you -- Let 7 8 me strike that and start over. 8 of the AK-47. 9 I want you to look at J little I Roman g Q So the WASR-10, you would agree, is a copy of numerals one through six and tell me which of the firearms 10 the AK-47? 10 listed here you believe are not properly characterized as 11 11 A It's a civilian legal copy, yes. 12 AK-types. Q And just so I understand, the distinction 12 A Anything that is not a traditional AK-47, you're making is that the AK-47 is an automatic weapon 13 13 14 AK-74 or the other Russian military variant would not be an and --14 AK-type. It would be an AKM variant, typically, for the 15 Α Correct. 16 civilian market. 16 O Is that correct? 17 Q So give me the specific model numbers here 17 Correct. Α that are listed that you think are not properly Q 18 18 And some of these are semi-automatic weapons? 19 characterized as A -- AK-types. 19 Anything but the AK-47 and AK-74 in the 20 A Sure. So things like the MAK-90, the MISR, 20 civilian market are civilian weapons. NHM90, NHM91, SA-93, the Vector, VEPR, WASR-10, the Maadi, 21 21 Do you think that a -- I ke a Palmetto State 22 and Norinco items, and the SKS. Armory AK-47 variant that's semi-automatic is properly 22 23 Q So of these models, how many of these did you 23 characterized as an AK-47? identify in your declaration of -- the two declarations 24 A It's not a machine gun as the original AK-47 25 that you prepared in this case? 25 was. So it's a derivative, yes, but it's not a variant.



Scott Pulaski Page 93 Page 95 Q So you would only use the term AK-47 to apply 1 and several parts kits were imported and converted to 2 2 to fully automatic firearms? civilian use to not -- no longer be automatic and legal 3 A In definitional terms, yes. But in jargon, 3 with federal law. not necessarily. Q Can civilians outside of Illinois and 5 So out there in the world, if you have 5 elsewhere in the United States acquire Maadi AK-47s in customers who come into Piasa Armory and they say I want an semi-automatic form? 6 6 7 AK-47, do you -- do you show them semi-automatic AK-47s? 7 A I believe they can. A We show them some variant of the AK that's 8 8 What is a Norinco 56S? civilian legal, like the WASR-10, or direct them to 9 A Norinco is a Chinese manufacturer that made Palmetto State Armory for their PAS AK-47. copies of the AK-47. The Norinco models that came to the United States were semi-automatic. 11 Q So a customer who would use AK-47 in that 11 context who would refer to a semi-automatic, you would 12 And you say came to the United States, are 12 13 understand what they meant? 13 they still coming to the United States? 14 A I would, yes. 14 No. 15 The NHM-90, why is that -- why do you consider 15 When did that stop? 16 that to be something other than an AK-type firearm? 16 Α To my knowledge, that was in the '90s, during 17 Because it's not an AK-47. 17 the changes to federal import laws. 18 Why not? 18 So of today, you're not aware of any Norinco 19 Α That's not a -- not a Russian military issued 19 56Ss being legally imported into the United States? 20 AK-model 47. 20 To my knowledge, no. 21 Q What is it? 21 And would that also apply to the 56S2? 22 22 A That's -- I -- I'm sorry. I don't recall what Any Norinco product, to my knowledge. Α And it would also apply to the 84S? that specific one is manufactured -- who it's manufactured 23 23 Q by. But it's just one of the other many civilian legal 24 Α Correct. varieties, copies of the AK-47. 25 And the 86S from Norinco? 25 Page 94 Page 96 1 Q So you would agree that NHM-90 is a civilian 1 A Correct. legal variant of the AK-47? 2 Q Why do you think the SKS is not properly 2 3 A A copy, yes. Not a -- Not a variant 3 characterized as an AK-type? Because it's an SKS and not an AK. 4 necessarily, but a derivative of. 5 Q Would you also agree that the MAK-90 is a 5 What's different about the two firearms? 6 civilian legal variant of the AK-47? The entire operating system is different. The 6 7 Possibly. 7 AK uses a single piston. The SKS uses multiple. SKS uses 8 Q Is that a yes? 8 internal magazines, where the AK-47 uses detachable magazines. 9 Α Yes. 9 10 Q Is the SA-85 a civilian legal variant of the 10 Does the SKS use the same caliber of AK-47? 11 11 ammunition as the AK-47? Α It does. 12 Α It could be. 12 And does the SKS, was it created in the same 13 O Is that a yes? 13 O country as the AK-47? 14 Α 14 15 Α Yes. 15 Q Is the SA-93 a civilian legal variant of the 16 AK-47? 16 O And what country was that? Russia or the Soviet Union. 17 Α A copy, yes. 17 18 The VEPR. Is the VEPR a civilian legal 18 All right. I'm going to direct your attention variant of the AK-47? back to the ISP guide. Directing your attention to 19 19 20 A similar, yes. 20 Deposition Exhibit 10, pages 25 to 26. 21 And we mentioned the WASR-10. You agree that 21 Do you see at the top of page 25, it says, "Other AK-type rifles as designed -- as defined by the 22 that is a civilian legal variant of the AK-47? 22 23 23 Correct. Protecting Illinois Communities Act." 24 24 How about the Maadi AK-47, what is that? Do you see that? 25 The Maadi is an Egyptian copy of the AK-47, 25 A Yes.



		Scott	ruic	
1	Q	Page 97 And the top of the page there, page 25, it	1	Page 99  A I would consider these to be copies of the
2		almetto State Armory Armory, PS AK-47 GF3."	2	2 AK-type firearms with some with modernized features and
3	-	Do you see that?	3	3 not holding true to the original design of the AK-47.
4		Yes.	4	4 Q You would at least agree that all the firearms
5	Q	You mentioned earlier that if a customer came	5	5 depicted on pages 25 to 26 of Deposition Exhibit 10 are
6	in asking	g for an AK-47, you might direct them to Palmetto	6	6 copies of the AK in some degree?
7		mory; is that right?	7	7 A Some variance or derivative of.
8		Correct.	8	8 Q That's a yes?
9	Q	And is this one of the types of AK models that	9	9 A Yes.
10	you wo	uld direct them to?	10	Q You can set that to the side for a second.
11	A	Yes.	11	11 (Deposition Exh bit No. 13 marked for
12	Q	And is that because the PS AK-47 GF3 is a	12	12 identification.)
13	semi-au	utomatic civilian version of the AK-47?	13	I3 Q (By Mr. Wells) I'm handing you what's been
14	A	That's a civilian copy of it, yes.	14	
15	Q	And looking at the PS AK-47 GF3 at the top of	15	
16		5, as far as you can tell, it's a semi-automatic	16	
17	rifle?	,, ao .a. ao , ao ao, a ao aa ao	17	
18	Α	It appears to be.	18	, ,
19	Q	And it has a detachable magazine?	19	
20	A	It does.	20	•
21	Q	Does it also have a pistol grip?	21	
22	A	It does.	22	
23	Q	Does it have a flash suppressor?	23	
24	A	It does not.	24	
25	Q	Does it have an adjustable stock?	25	25 from Palmetto State Armory?
				•
1	Α	Page 98 This does not appear to be.	1	Page 100  A I believe that refers to their AK-47 variant
2	Q	But you would agree that the PS AK-47 GF3 is	2	
3		called an AK-type firearm?	3	•
4		I would call it a copy of the AK firearm.	4	·
5	Q	Direct your attention to the next firearm down		5 handgun without a stock or with shorter barrels.
		, so the second from the top. The Century Arms VS		
		you agree that that's an AK-type firearm?	7	
8	•	It's a again, a civilian copy of the AK.	8	
9	Q	As far as you can tell, is it a semi-automatic	9	
10	rifle?		10	
11	Α	It appears to be.	11	Q And those are the reasons why it would be
12	Q	Does it have a detachable magazine?	12	12 classified as a pistol; right?
13	A	It does.	13	, · · · · ·
14	Q	Does it have a pistol grip?	14	Q What are the reasons why the AKP from Palmetto
15	A	It does.	15	
16	Q	Moving down to the Kalashnikov USAKR 103. Do	16	•
17		•	17	17 characteristics as their PS AK-47 rifle, other than legal
18	A	I do.	18	
19	Q	Would you disagree that the Kalashnikov USAKR	19	·
20		n AK-type firearm?	20	
21		It's a copy of them, yes.	21	
22	Q	All right. I'd like you look at pages 25 and	22	
23		I I would I ke you to tell me if there are any	23	
24		depicted here that you would not consider an	24	
	AK-type		25	
	.,,,,,			



Page 101 Page 103 but back to Exh bit 13. I'm going to direct your attention 1 MR. MAAG: Of? 2 to page three. The text in the middle of the page, the MR. WELLS: The same exhibit, Deposition 3 Exh bit 13. kind of last text before --A Yes. 4 Q (By Mr. Wells) So do you understand what you see here to be comments from visitors to the website 5 -- it stops. 5 6 6 commenting on the Palmetto State Armory or PSA AK-47 GF 5? Do you see where it says, "As we are 7 transitioning to Soviet arms, your receivers may be stamped 7 A Yes 8 with our new AK Soviet arms logo on firearms manufactured Q Under another PSA winner, do you see where it 8 9 after March 8th, 2023. This will not affect the quality or 9 says, "My first AK, and it is a beauty?" Do you see that? function of the firearm as they are the same AK receivers 10 used for our AKs." 11 11 Q And do you understand what AK means in that 12 sentence? You understand what Palmetto State Armory is 12 saying here when it says AKs; right? 13 13 A As a member of the industry, yes. I can also 14 A I do. That's their model name. see from this that person's very new to the industry and 14 15 And their model name refers to civilian 15 firearms as a whole it appears. variants of the AK-47? Do -- do you believe -- In your experience at 16 16 17 A Civilian copies, yes. 17 Piasa Armory, do customers use the phrase AK as a reference 18 I keep saying variants, you keep saying 18 to civilian versions of the AK-47? 19 19 copies. Why -- why are you correcting --A In general, our customer base tends to shorten 20 A A variant would be something like the AK-74 or 20 terms. So somebody may refer to an AK but mean an AK-47 something that would be a light machine gun variant of the 21 copy or an AK-74 copy or a 12-gauge copy of the AK, 21 traditional AK-47s. Something like a longer barrel where 22 22 referring to the Saiga shotguns or any other similar it would take a drum or a belt magazine or belt feeding 23 shotguns of that same cosmetically similar design. 23 device, something that might be a precision rifle variant 24 Q All right. Let's see. You mentioned that you of it. In the same way that a Toyota Camry has a variety 25 sometimes go to AR-15.com; is that right? Page 102 Page 104 1 of model options, those are variants of that same base 1 A I do. 2 model. 2 And you sometimes review the -- what people 3 Q So, in your mind, copy is actually closer to 3 have posted there; is that right? 4 the original? 4 A Ido. 5 A Not necessarily. Copies can be -- They may 5 (Deposition Exh bit No. 14 marked for make changes that are functionally or cosmetically 6 6 identification.) different to modernize. Or like -- I believe this one was 7 (By Mr. Wells) I'm marking Deposition trying to be as close to a classic AK-style, the wood 8 Exhibit 14. Do you recognize this? 9 furniture that's on the gun, that kind of darker color 9 I recognize this as AR-15.com, yes. that's out there. So it's just trying to be a copy of the 10 So these are screen shots from AR-15.com. You original but still be within the rules, regulations, 11 can see the URLs at the top. And on the first page of civilian legal, but not necessarily a variant of the same Deposition Exhibit 14, do you recognize this as the -- the 12 12 13 gun. 13 main page of AR-15.com? Q The look and feel of the original AK-47; is 14 14 It appears to be. 15 that fair? 15 And do you see where it says discussion forums 16 16 and there's a drop down menu? Match the style, yes. 17 Q And capability; right? Aside from the 17 I do. automatic capability and the, you know, select fire 18 18 And one of the discussion forums listed is 19 capability, other than that, roughly the same? AK-47. Do you see that? 19 20 A Functionally in single fire, one shot at a 20 Α I do. 21 And in your experience going to AR-15.com, do 21 time, semi-automatic mode, yes, they'd be very similar, 22 yes. And I believe that last paragraph on page three 22 folks come to AR-15.com to participate in the discussion 23 refers to a branding change, not a manufacturer change. 23 forums to talk about AK-47s? 24 Q All right. Let's just look at the same 24 I would presume that they do. I tend to focus 25 exhibit, page seven. 25 more on the AR-15 side of the AR-15.com forums.



Page 105 interchangeability. Direct your attention to your May 19 Q So if you were looking to answer a specific 2 declaration, paragraph eight. This is Deposition 2 question, as you said you sometimes do with AR-15.com, about AKs and you came to this website, and you went to the 3 Exhibit 2. AK-47 forums, you would click on that discussion forum 4 In paragraph eight, you wrote "That is it." I where it says AK-47; is that fair to say? 5 assume you meant "that it is"; right? A If I was looking for information on copies of 6 Α 6 Yes. 7 the AK, yes. 7 "So that it is objectively imposs ble to 8 Q So I'd like to direct your attention to the 8 determine whether a given magazine, feed strip, or other 9 last page of the exhibit. ammunition feeding device is for a rifle, shotgun, handgun 9 10 Α Okay. 10 or something else simply by looking at the device." 11 And looking at the URL at the top, can you 11 Is that your testimony? tell that this is from AR-15.com? 12 12 Correct. 13 Yes. 13 Your concern is that if I handed you a Q And it's specifically the AK-47 page from 14 14 magazine by itself, and you had no other information to go 15 AR-15.com? on other than looking at the magazine, you could not say 16 Α 16 whether the magazine was for a handgun or a rifle; is that Q 17 right? 17 And here it says new AK products. Do you see that? 18 18 It depends on the magazine, but possibly, yes. 19 Α I do. 19 And that's the concern you're identifying in 20 Q You understand what that means; right? 20 paragraph eight? 21 Correct. 21 Α I do, yes. 22 Q And AK discussions is the next topic. Do you 22 If you were handed a magazine with no other see that? 23 23 information, by looking at the magazine, are there things 24 Α Yes. 24 that you could tell about that particular magazine? 25 25 I could assume that the caliber and make a Q You understand what that means? Page 108 Page 106 1 A That appears to be discussions about anything 1 presumption of what model it was originally intended for. 2 relevant to AK platform, copies, variants. 2 However, many firearms share the same magazines both in And -- and following that row over, do you see pistol and rifle variants. it says topics 5,600 and -- I'm sorry, 56,970. Do you see Q So you would be able to look at a magazine 5 that? 5 and -- and tell the caliber? 6 6 A Potentially. But there are many calibers that Α I do. 7 Q So would you agree that, at least as of the 7 are very similar, and it's not a -- a guarantee for many -time of this screen shot, there were apparently 56,970 8 a specific firearm or magazine. 9 topics under the AK discussions label? g Q Is it fair to say that you would be able to 10 I would. look at a magazine that was just handed to you with no 10 11 Q Do you see where it says, replies right under 11 other information and have a rough sense of what cal ber topics? would be used in that magazine? 12 12 13 I do. 13 Potentially, but again, it depends on the And it says 632,806? 14 14 particular magazine. 15 Yes. 15 Do you agree that not all magazines can be 16 So is -- Based on that, there appeared to have 16 used in all firearms? been 632,806 comments grouped under AK discussions; is that 17 Α Yes. 17 18 fair? 18 For example, you can't use a Beretta M-92 19 Α Yes. 9-millimeter magazine in a 5.56 NATO caliber AR-15; 19 So based on that, do you think the average correct? 20 20 21 person coming to AR-15.com to go to a discussion forum on 21 A In an AR-15 chambered for 5.56, no. But you the AK would understand that AK discussions is a reference 22 22 can use a Beretta .92 magazine in an AR-15 that is 23 to AK-47 type firearms? 23 chambered for 9-millimeter. 24 24 That would be reasonable, yes. Q Right. But you'd have to know what cal ber of 25 Okay. Let's see. Let's talk about 25 ammunition you're going to use in that AR-15; right?



	Scott	Pula	aski	
1	A You would.	1	Α	Page 111 Correct.
2	Q If you had a 5.56 NATO AR-15 and you attempted	2	Q	So in that example, neither one of those
3	to use 9-millimeter ammunition in it, what would happen?	3	firearms,	if you had a Beretta M-92 9-millimeter, you
4	A Well, the firearm may not function, and if it	4	couldn't u	use it in those firearms you just you just
5	did, it could cause damage or injury.	5	descr be	d, you couldn't use that magazine?
6	Q What kind of damage or injury?	6	Α	Correct.
7	A The Well, when a when a bullet is shot,	7	Q	Do you agree that there's some calibers that
8	it produces explosive gas, flame that and pressure. And	8	are more	commonly used in rifles than in handguns?
9	if that were to not be contained in the chamber of the	9	Α	Yes. However, that doesn't necessarily mean
10	firearm, which wouldn't be possible with 9-millimeter going	10	that a ca	aliber is exclusively for a handgun or a rifle.
11	into a 223 or 556 firearm, then that would go into the path	11	For exa	mple, a 9-millimeter is a very common caliber in
12	of least resistance.	12	rifles an	nd in handguns22 caliber, similar.
13	Q For two firearms to be able to use the same	13	Q	6.5 Grendel, is that more common as a rifle or
14	magazine, the firearms at least have to use the same	14	handgur	ammunition?
15	caliber of ammunition; is that fair to say?	15	Α	We've seen both as from our customer base.
16	A No.	16	A bolt p	istol handgun variant AR-15, copy AR-15s, and rifle
17	Q Is it fair to say that the two firearms, if	17	сору АГ	R-15s.
18	they're going to use the same magazine, have to share at	18	Q	Which would you say is more prevalent, rifles
19	least one common caliber of ammunition that they use?	19	that use	6.5 Grendel or handguns that use 6.5 Grendel?
20	A Not necessarily. Example again is the 556,	20	Α	In this particular area, handguns, just based
21	223 and the 50 Beowulf, 458 SOCOM, 223, a 30-round magazine	21	on our	geography and lack of available areas to use those
22	only accommodates nine to 10 rounds of 50 Beowulf or 58	22	firearms	s.
23	SOCOM.	23	Q	What about a 338 Lapua? Are you familiar with
24	Q So you're talking about the magazine. I'm	24	any han	dgun that uses 338 Lapua ammunition?
25	asking about the firearm.	25	Α	I believe that a company has produced
	Page 110			Page 112
1	A Okay.	1	somethi	Page 112 ing that would be considered a handgun without a
1 2		1 2		
	A Okay.			ng that would be considered a handgun without a
2	A Okay.  Q So in order for one firearm chambered in a	2		ing that would be considered a handgun without a ith a shorter barrel and only pistol grip.
2	A Okay.  Q So in order for one firearm chambered in a specific cal ber to have a magazine that can be used in	<b>2</b> 3	stock w	ing that would be considered a handgun without a ith a shorter barrel and only pistol grip.  What kind of Walther again?
2 3 4	A Okay.  Q So in order for one firearm chambered in a specific cal ber to have a magazine that can be used in another firearm chambered in a cal ber, there has to be at	2 3 4	stock w Q A Q	ing that would be considered a handgun without a ith a shorter barrel and only pistol grip.  What kind of Walther again?  It is a PPQ Q5 match.
2 3 4	A Okay.  Q So in order for one firearm chambered in a specific cal ber to have a magazine that can be used in another firearm chambered in a cal ber, there has to be at least one common caliber between those two firearms;	2 3 4 5 6	stock w Q A Q	ing that would be considered a handgun without a ith a shorter barrel and only pistol grip.  What kind of Walther again?  It is a PPQ Q5 match.  In your experience, is Walther a good firearm?
2 3 4 5 6 7	A Okay.  Q So in order for one firearm chambered in a specific cal ber to have a magazine that can be used in another firearm chambered in a cal ber, there has to be at least one common caliber between those two firearms; correct? For the magazine to function?	2 3 4 5 6	Q A Q A yes.	ing that would be considered a handgun without a ith a shorter barrel and only pistol grip.  What kind of Walther again?  It is a PPQ Q5 match.  In your experience, is Walther a good firearm?
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2 3 4 5 6 7 8	A Okay.  Q So in order for one firearm chambered in a specific cal ber to have a magazine that can be used in another firearm chambered in a cal ber, there has to be at least one common caliber between those two firearms; correct? For the magazine to function?  A Well, if both fire I'm sorry. I guess I'm not understanding clarity-wise. But if you have an AR-15 that is chambered in 223 and an AR-15 that we chambered in	2 3 4 5 6 7 8	Q A Q A yes. Q just know	ing that would be considered a handgun without a ith a shorter barrel and only pistol grip. What kind of Walther again? It is a PPQ Q5 match. In your experience, is Walther a good firearm? A reputable brand and quality manufacturer,  And you, as a firearms expert or someone who
2 3 4 5 6 7 8 9	A Okay.  Q So in order for one firearm chambered in a specific cal ber to have a magazine that can be used in another firearm chambered in a cal ber, there has to be at least one common caliber between those two firearms; correct? For the magazine to function?  A Well, if both fire I'm sorry. I guess I'm not understanding clarity-wise. But if you have an AR-15 that is chambered in 223 and an AR-15 that we chambered in	2 3 4 5 6 7 8 9	Q A Q A yes. Q just know firearm	ing that would be considered a handgun without a ith a shorter barrel and only pistol grip.  What kind of Walther again?  It is a PPQ Q5 match.  In your experience, is Walther a good firearm?  A reputable brand and quality manufacturer,  And you, as a firearms expert or someone who we a lot about firearms, in terms of picking a
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2 3 4 5 6 7 8 9 100 111 12 13 14 15 16 17 18 19 20 21 22 23	A Okay.  Q So in order for one firearm chambered in a specific cal ber to have a magazine that can be used in another firearm chambered in a cal ber, there has to be at least one common caliber between those two firearms; correct? For the magazine to function?  A Well, if both fire I'm sorry. I guess I'm not understanding clarity-wise. But if you have an AR-15 that is chambered in 223 and an AR-15 that we chambered in 50 Beowulf or 58 SOCOM, those don't share the same caliber, of course, but they do share the same magazine.  And cosmetically, the magazine is no different between the same firearms. You could use all of the ammunition load that magazine with 223 or 556, fire it in that firearm that was chambered for 223 or 556. Use the same exact magazine, load it with 50 Beowulf, 458 SOCOM, the appropriate caliber for that second firearm, and then fire with that same magazine with that lower capacity.  Q The weapons that you just described, are all of those weapons assault weapons under PICA?  A Potentially, but not necessarily.  Q And you're talking about calibers and ammunition that can be used in magazines that will fit in	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	stock w Q A Q A yes. Q just know firearm defend A Q affirmati right? A Q Exhibit	ing that would be considered a handgun without a lith a shorter barrel and only pistol grip.  What kind of Walther again?  It is a PPQ Q5 match.  In your experience, is Walther a good firearm?  A reputable brand and quality manufacturer,  And you, as a firearms expert or someone who way a lot about firearms, in terms of picking a that you're going to carry around with you to yourself, you're going to choose carefully; right?  Yes.  So the fact that you chose a Walther is an ion in your mind that Walther is a quality brand;  In my mind, yes.  I'm going to hand you Sixteen.  what I'm going to mark as Deposition  16.  (Deposition Exhibit No. 16 marked for ation.)  (By Mr. Wells) Looking at Deposition
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Okay.  Q So in order for one firearm chambered in a specific cal ber to have a magazine that can be used in another firearm chambered in a cal ber, there has to be at least one common caliber between those two firearms; correct? For the magazine to function?  A Well, if both fire I'm sorry. I guess I'm not understanding clarity-wise. But if you have an AR-15 that is chambered in 223 and an AR-15 that we chambered in 50 Beowulf or 58 SOCOM, those don't share the same caliber, of course, but they do share the same magazine.  And cosmetically, the magazine is no different between the same firearms. You could use all of the ammunition load that magazine with 223 or 556, fire it in that firearm that was chambered for 223 or 556. Use the same exact magazine, load it with 50 Beowulf, 458 SOCOM, the appropriate caliber for that second firearm, and then fire with that same magazine with that lower capacity.  Q The weapons that you just described, are all of those weapons assault weapons under PICA?  A Potentially, but not necessarily.  Q And you're talking about calibers and ammunition that can be used in magazines that will fit in rifles that can take large cal ber ammunition, like the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	stock w Q A Q A yes. Q just know firearm defend A Q affirmati right? A Q Exhibit	ing that would be considered a handgun without a lith a shorter barrel and only pistol grip.  What kind of Walther again?  It is a PPQ Q5 match.  In your experience, is Walther a good firearm?  A reputable brand and quality manufacturer,  And you, as a firearms expert or someone who way a lot about firearms, in terms of picking a that you're going to carry around with you to yourself, you're going to choose carefully; right?  Yes.  So the fact that you chose a Walther is an ion in your mind that Walther is a quality brand;  In my mind, yes.  I'm going to hand you Sixteen.  what I'm going to mark as Deposition  16.  (Deposition Exhibit No. 16 marked for action.)



2,0-(	CV-002	Scott l	Pula	aski	age 30 01 230 Fage ID #3930
1	Q	Page 113 Do you see that the URL says	1	Q	Page 115 What is the magazine capacity for the PDP full
2		arms.com/PDP?	2		What is the magazine capacity for the FDF full
3		l do.	3	SIZE!	Fighteen rounds
4		And I can represent to you that this is screen	4	Q	<b>Eighteen rounds.</b> And the magazine there for the PDP of PDP
		m the Walther Arms page specifically about the	5		of 18 rounds, that's above the 15-round threshold
	PDP?	in the Walther Arms page specifically about the			•
7		Yes.	6 7	for PICA	lt is.
8		And are you familiar with the PDP by Walther?			
		lam.	8		So that magazine is not one that you could sistent with PICA?
9	Q	What is it?	9		
10			10	_	Correct.
11	A		11	Q full oizo	But if a customer at Piasa Armory wanted a PDP
12		striker fired with detachable magazines.	12		, you could direct them to the 10-round item;
13		•	13	J	Ma apple
		is apparently awarded the guns and ammo 2021 handgun	14	_	We could.
15	•		15	Q	And the 10-round magazine would comply with
16	_	Yes.	16		16
17	Q	Do you think that was a well-deserved award?	17	A	It would.
18		I Based on Walther's history and quality, I	18	Q	Just looking at the last page of this exhibit.
	would,		19		sells 10-round magazines for the PDP; right?
20		All right. Let me direct your attention to	20	_	For the full side and the compact, yes.
21		of that page. So it's a double-sided copy.	21	Q	All right.
22		Yeah.	22		(Deposition Exhibit No. 17 marked for
23		Do you see that there are three handguns	23	identific	
24	•		24		(By Mr. Wells) This is No. 17. We talked
25	А	I do.	25	about tr	ne Shooter's Bible earlier. Do you recall that?
1		Page 114	4	Δ	Page 116
1		on page two of this exhibit? The handgun	1		I do.
2		d on the left, it's called a PDP compact. Do you	2		So I am marking as Deposition Exhibit 17
3	see that		3	_	MR. MAAG: Oh, I see how it is.
5	Α	I do.	4	Q Evhibit 1	(By Mr. Wells) I'm marking as Deposition
	Q what's li	And under magazine capacity, what what's	5		17 an excerpt of the Shooter's Bible 114th Edition.
6			6		complete copy of it, but I'm I've just given
7	_	It lists 15 rounds.	7	-	erpts, which are copied pages from this complete
8	Q	What does that mean?	8	version.	
9	A!41- 41-	That means that the magazine that's included	9	A	
10		at firearm, that particular item number, is a	10	Q	And you mentioned earlier that you keep copies
11	15-roui		11		Shooter's Bible for reference at Piasa Armory; is
12	Q	,	12	J	
13		it says 10-round item number? The same column.	13		Typically, yes.
14		l do.	14		, ,
15		What do you understand 10-round item number to	15		ht, is from 2022. And I'm going to direct your
	mean?		16		n to page 153, directing your attention to the
17	Α	That to be 10-round magazine capacity variant.	17		of the page, Heckler & Koch.
18	Q	,	18		Do you see three rifles laid out there that
19	•	hat a person interested in purchasing a PDP compact	19		ckler & Koch rifles?
20		urchase either a PDP compact with a factory magazine	20	_	I do.
21		ounds or a factory magazine of 10 rounds?	21	Q	Are you familiar with the Heckler & Koch
22	_	Yes.	22	MR762	
23	Q	0,	23		I am.
24		in the middle, PDP full size. Do you see that?	24		And the Heckler & Koch MR762A1 is a rifle;
25	Α	l do.	25	correct?	?
1					



Page 117 Page 119 It is. Q When you're buying a magazine for a specific Δ 2 2 handgun, it is possible to know how many rounds of Q And a rifle is a long gun? 3 ammunition of a particular caliber that magazine will hold? It's typically referred to as, yes. 3 4 And do you see on page 153 here, under 4 A It's possible to know how -- how many it was magazine, it says, detachable box, 10 rounds, 20 rounds, do 5 designed to hold, but designed does not always line up with you see that? how many it will actually hold. Magazines that begin to 6 7 Δ Yes. 7 wear or were not designed properly can sometimes hold more 8 or sometimes hold less, or errors in manufacturing can make 8 Q So I want you to imagine you had a customer who owned a version of this rifle, so the Heckler & Koch them hold more or less. MR762A1, that they purchased before January 10th of 2023, 10 Q But generally speaking, what the manufacturer so before PICA took effect. 11 represents about the capacity of the magazine is what the 11 12 Okay. magazine capacity is? Α 12 13 Q And this customer needs a replacement magazine 13 A Magazines from reputable manufacturers, yes. 14 Q And when you're buying a magazine for a 14 for that rifle, for the MR762A1. Between the 10-round 15 magazine and the 20-round magazine, which of those specific handgun, it is possible to buy a magazine of 15 rounds or less as long as the handgun manufacturer offers 16 magazines can you sell to that customer? 16 17 17 such a magazine for that handgun; correct? A We would be required to only sell the 10-round magazine. 18 A If the customer would like to purchase a 18 19 All right. I'm going to direct your attention 19 factory brand magazine, yes. But again, not every company 20 to -- and -- I'm sorry. Before I leave that page, 20 produces factory magazines of 15 or -- of 15 rounds for page 153, do you see on the -- the right-hand side how it 21 guns that are not designed for 15-round magazines. 21 22 Q And when you're buying a magazine for a 22 has rifles there? 23 A I do. 23 specific rifle, it is possible to know how many rounds of 24 24 And is it fair to say that the Shooter's Bible ammunition of a particular cal ber that magazine will hold? 25 groups firearms into categories like rifle, handgun and 25 A Based on what the manufacturer of the magazine Page 120 Page 118 shotgun? 1 says. But again, other magazines can hold other calibers. 1 2 A Yes. 2 Q So there may be some variation, but generally 3 And that's because those are -- rifle, handgun 3 speaking, what the manufacturer represents about the and shotgun are pretty common types of firearms? 4 magazine capacity for a particular rifle is going to be the A Those are industry terms for the -- the 5 magazine capacity? variety of things that are offered from various 6 6 It depends on the rifle and the manufacturer. 7 manufacturers, yes. 7 If it's a reputable manufacturer? 8 Q I'm going to direct your attention to page 363 8 It can be, but magazines like AR-15 magazines of this exhibit. I'm directing your attention to the upper 9 9 can be produced by reputable manufacturers but hold 30 of 10 left-hand corner of the SP5. Do you see that? 10 one round and five or 10 of another round. 11 I do. 11 Q And in the examples you just gave of a 12 Do you see for the SP5, next to capacity, it magazine that can hold 30 of one round and five or 10 of 12 says 10, 15, 30 rounds? Do you see that? another round, the five or 10 of another round would be a 13 13 14 much larger caliber; right? 14 15 Do you agree that the Heckler & Koch SP5 is a 15 A Typically. 16 handgun? 16 So when someone buys an AR-15, let's say it 17 has a 15-round -- or let's say it has a 10-round magazine. A This variant of the SP5 is, yes. 17 So I want you to imagine, again, a customer All right? So an AR-15, 10-round magazine, it may be a 18 18 who owns a Heckler & Koch SP5 that they acquired prior to 19 10-round magazine for 5.56 NATO; is that right? 19 January 10, 2023, when PICA took effect. They need to 20 20 Correct. 21 replace the magazine for the Heckler & Koch SP5. Which 21 But that same magazine for a larger caliber may hold fewer than 10 rounds: correct? 22 capacity magazine can you legally see to that customer? 22 23 A They would typically purchase that with a 23 Correct. 30-round magazine. We would be limited to selling them the 24 Q If -- If that same magazine is designed for an 25 10 or 15-round magazine. 25 AR-15 that's chambered in 5.56 NATO, and the magazine



Page 121 Page 123 capacity is 10 rounds, can the magazine accept more than 10 A Yes. 2 rounds of a different cal ber of ammunition? Q In preparing those declarations, did you get 3 A It depends on the overall size of the 3 any information from Mr. Maag that you included in those magazine. For example, Magpul is the industry -- industry declarations? standard for AR-15 magazines has a magazine that is designed for 10 rounds only, but shares the same form 6 O What information specifically? 6 7 factor as the 30-round magazine. 7 I didn't keep a list of specific information, 8 Q When you say form factor, what do you mean? 8 but this was a discussion back and forth through the 9 The outside appearance. entire -- through the entirety of both of these 10 Q And what is different about the inside of that 10 declarations. 11 magazine? Q And is information from an attorney in a 12 The inside has either a block or is built with lawsuit the type of information that firearms experts Α 12 13 denial spaces to prevent that large capacity. 13 typically rely on? Q Why -- Do you have an understanding as to why 14 A That depends on the attorney. This particular 14 15 Magpul did that? 15 attorney happens to also be a firearms expert with much deeper encyclopedic-level knowledge than I have. He's 16 A They sold a lot to customers in California and 16 17 other states with 10-round magazine capacity limits who 17 guided me toward a lot -- a lot more places to broaden my wanted to use other equipment standard to the AR-15 18 knowledge. 18 19 19 industry, things like magazine pouches and magazine Q We taked earlier about AR-type rifles. Does 20 couplers, but still retain that form factor of a 30-round 20 AR -- if -- If you use the term "AR-type," would that 21 magazine. 21 sometimes fairly include both the AR-15 and the AR-10? 22 22 Q So it's your understanding that Magpul A In a layman's term, yes, but -- So somebody 23 with lack of knowledge of the industry, lack of firearms 23 recognized that there was a 10-round magazine limit 24 applicable in California, and they designed the inside of 24 knowledge. Just in the same way that anyone says car, they 25 the magazine that could be used for a 30-round AR-15 such 25 look at any car and say that's a car. But somebody that Page 122 that that magazine could only accept 10 rounds; is that 1 has more knowledge says, yes, that's a Toyota or a Honda. 2 right? 2 Similar ways -- analogous to differences between the AR-10 3 Correct. They also sell limiting items. So and the AR-15. something you could take the magazine apart, insert into 4 MR. WELLS: So subject to my reservation 5 the magazine to prevent additional rounds from going into 5 rights earlier on about the scope of this deposition, my 6 it. 6 motion for summary judgment, and reserving the right to 7 Q And if someone needed to replace AR-15 7 potentially seek a second deposition, to the extent 8 magazines in Illinois, could the manufacturer do the same necessary, related to the other claims that aren't covered 9 thing in Illinois for a 10-round limit? 9 by the summary judgment motion, I don't have any further 10 Potentially, but that would be up to the 10 questions for you at this time. 11 THE WITNESS: Okay. 11 manufacturer and business decisions. Q And if a manufacturer did offer such a 12 12 MR. MAAG: Like the last time, it would be 13 magazine, you would be able to sell it under PICA; right? 13 quicker if we changed sides. 14 14 MR. WELLS: Sure. 15 MR. WELLS: Can we take a quick break real 15 MR. MAAG: We can go off while we're changing 16 quick? 16 sides. 17 THE VIDEOGRAPHER: This is the videographer. 17 THE VIDEOGRAPHER: This is the videographer. 18 We're going off the record. The time now is 4:56. 18 We're going off the record. The time now is 5:05. 19 (Whereupon, a short break was taken.) 19 (Whereupon, a short break was taken.) 20 THE VIDEOGRAPHER: This is the videographer. THE VIDEOGRAPHER: This is the videographer. 20 21 We're back on the record. The time now is 5:03. 21 We're back on the record. The time now is 5:07. 22 **EXAMINATION** 22 Q (By Mr. Wells) Mr. Pulaski, we previously QUESTIONS BY MR. MAAG: 23 looked at the two sworn written statements that you 23 prepared in this case as Deposition Exhibits 1 and 2. Do 24 Q I'm handing you a magazine. Are there any you remember that? 25 markings on that?



	Scott I	Pula	aski
1	Page 125 MR. WELLS: Tom, I'm just going to note,	1	Page 127 Q All right. Are you able to discern whether
2	again, my objection that I had before which is	2	that's a rifle, pistol or shotgun magazine?
3	MR. MAAG: Same objection that you put on the	3	A I can presume that it is not a shotgun
4	record before, you can have a standing objection.	4	magazine. However, there are shotgun rounds that could fit
5	MR. WELLS: Right, but it's another it's	5	
6	another witness, so I just want to be clear. These are	6	Q Are you able to discern whether that's a rifle
7	items that prior to today I personally had not seen. They	7	
8	were not produced to us. I under understand your	8	A No.
9	position on that, but I just want to note my objection to	9	Q Set that aside and go to what you have
10	the use of these particular items in this deposition as	10	· · · · · · · · · · · · · · · · · · ·
11	well.	11	markings on that?
12	MR. MAAG: All right. And for the record, I	12	•
13	didn't see all of your documents prior to today either, but	13	
14	you're you're on the record.	14	
15	MR. WELLS: Right. And you didn't serve any	15	Q All right. Is there any functional difference
16	written discovery requests on us; right?	16	
17	Q (By Mr. Maag) All right. You ready?	17	A No. They're all a box with a spring inside.
18	A Go ahead.	18	Q Okay. I'll hand you another magazine. Do you
19	Q Generally, what is that that I've handed you?	19	
20	A That's a magazine that is made in Brazil, and	20	
21	it says 15 on the back of it.	21	
22	Q All right. Is there any serial number or	22	
23	model marking on that?	23	
24	A There is not.	24	Q All right. If I were to represent to you that
25	Q Do you recognize that, what that fits?	25	that is a French Model 1949 magazine, would that help you
1	Page 126  A It would fit, based on a notch in the back of	1	Page 128 in any way, shape or form?
2	it, an older Beretta style pistol or rifle that takes older	2	A Yes.
3	style Beretta magazines.	3	Q All right. Are you able to discern from your
4	Q Okay. Is that a rifle magazine? Pistol	4	observations whether that's a rifle or pistol magazine?
5	magazine? Or are you able to discern the difference?	5	A If I were to know that this was a French M-49
6	A Because it can fit both, I can't discern	6	magazine, I would know that it was for the M-49. However,
7	whether it's one or the other.	7	those can be converted into pistols as well.
8	Q Okay. I'm handing you another magazine. Are	8	Q I'm handing you a magazine. Do you recognize
9	there any markings on that?	9	that magazine?
10	A I see none.	10	A I do.
11	Q Do you recognize that magazine?	11	Q What is that?
12	A This looks like a magazine from a Mini-14	12	A This is for an M-1 carbine.
13	or I'm sorry, a M-14 or similar variant.	13	Q All right. And do you know about how many
14	Q I'm handing you a third magazine. Do you	14	rounds assuming that's a standard magazine for an M-1
15	recognize that magazine?	15	carbine of that size, how many rounds that should hold?
16	A That one is definitely a magazine of M-14 or	16	A It appears it should be 15.
17	similar, M1A.	17	Q All right. And the M-1 carbine, is that a
18	Q All right. The first Or the second	18	rifle, pistol or shotgun?
19	magazine that you previously thought might have been an	19	A It is either a rifle or a pistol.
20	M-14 variant, do you still think that's an M-14 variant?	20	Traditionally, for the military, it was a rifle. However,
21	A No.	21	they were modified to become pistols and are currently
22	Q All right. Let's go back to the second	22	produced as pistols also.
23	magazine. Are you able to discern what that magazine is	23	Q And who currently produces them as pistols?
24	actually for now?	24	A Inland Manufacturing.
25	A No.	25	Q All right. Did anyone else previously
1		1	



4	manufact	Page 129		Δ	Page 131
1		ure them as pistols?	1	Α	I can.
2		I'm sure that they have.	2	Q	Does it fit?
3		Okay. So that magazine could fit either a	3	A	It does. It doesn't lock because there's
4	rifle or a p		4	•	S aren't there.
5	Α `		5		Right. It's nonfunctional because it's
6		All right. Could you legally sell that in	6		mbled and missing most of the parts; correct?
7	Illinois?	If it were for a mintal way If it was for	7	Α	Right.
8		If it were for a pistol, yes. If it were for	8		All right. Is there Assuming that that
9	a rifle, no		9	•	as complete, does that appear that that magazine
10		If a customer came in and said I have an M-1	10		unction in that frame?
11		can you order me a 15-round magazine for it, do	11		Yes.
12	•	enough information to determine whether or not you	12		All right. And that frame is normally in a
13	_	ally sell that magazine?	13	-	onfiguration?
14		No.	14		We've seen and sold them in both
15		If they told you that it was for a pistol,	15	_	urations, pistol and rifle.
16	•	u legally order and sell that magazine?	16	Q	0
17		If it was for a 15 If it was 15 rounds for	17	Α	
18	a pistol,	•	18	Q	,
19		What if that person owned both an M-1 carbine	19		s complete with a barrel, that same frame would now
20	•	d an M-1 rifle?	20	be wha	
21		I would have no way of discerning that from	21	Α	It would be considered a short-barreled rifle.
22		on at the counter.	22	Q	It'd be a rifle?
23		All right.	23	Α	Yes.
24		But it would presume that they would not be	24	Q	All right. With the same magazine?
25	allowed	to use that in their rifle if they bought a	25	Α	With the same magazine.
_	45	Page 130	1		Page 132 So mechanically, there is no difference
<b>1</b> 2	_	d magazine.	2		that magazine as a rifle magazine and that magazine
	Q	All right.	3		rol magazine as a fine magazine and macmagazine and macmagazine
<b>3</b>	Α	Thank you.  Are there any markings on that magazine?	4	as a pist	Correct.
5	Q A	It says "checkmate" on the bottom.	5	0	All right. I'm handing you another magazine.
	Α	All right. Do you recognize that magazine?	6		e any markings on that?
6 <b>7</b>	Q		7	Are trien	There are some numbers on the back of it.
	A side I r	I recognize it, and it says 45 ACP on the	8	Q	What are the numbers?
8		ecognize the basic design. What is the basic design?	9	A	It's A15981.
9	_	· ·		_	All right. Do you recognize that magazine?
10	Α	That is for pistols that are of the 1911 style	10	Q A	
11	_	riety of conversions that were rifle variants.	11 12	A K not	It appears to be a 308 or 76239 variant of a
12	Q	All right. What is the 1911 style?		•	entially. No, I take that back. No, I do not
13	A	1911 is the U.S. military pistol adopted in	13	_	ize this magazine. It's missing a part of the front.
14	_	t was standard until the late '70s, early '80s.	14		All right. Well, it's actually complete,
15	Q	Okay. Are there rifles that use that	15	_	Ones Complete for the second to bed
16			16	Α	, ,
	A	Yes.	17		nplete for what I thought it was.
17	Q	Are there pistols that use that magazine?	18		All right. Are you able to discern whether
18		V 00	19	that is a	rifle or a pistol or a shotgun magazine?
18 <b>19</b>	Α	Yes.		_	NI -
18 <b>19</b> 20	<b>A</b> Q	I'm handing you Well, what am I handing	20	A	
18 <b>19</b> 20 21	A Q you?	I'm handing you Well, what am I handing	<b>20</b> 21	Q	All right. Let's see. Handing you another
18 19 20 21 22	A Q you? A	I'm handing you Well, what am I handing  This is a frame for a 1911.	20 21 22	Q magazir	All right. Let's see. Handing you another ne. Are there any markings on that?
18 19 20 21 22 23	A Q you? A	I'm handing you Well, what am I handing  This is a frame for a 1911.  Is that magazine compatible with that?	20 21 22 23	Q	All right. Let's see. Handing you another ne. Are there any markings on that?  There is Walther markings on it.
18 <b>19</b> 20 21 <b>22</b>	A Q you? A	I'm handing you Well, what am I handing  This is a frame for a 1911.	20 21 22 23 24	Q magazir	All right. Let's see. Handing you another ne. Are there any markings on that?



		Scott	Pula	aski	
1	Α	Page 133 It says Walther P-1 9-millimeter.	1	compat	Page 135 ible magazine.
2	Q	Okay. Is that a rifle or a pistol magazine?	2	Q	All right. And I'm handing you a frame. What
3	Α	Unknown, but	3	is that fr	rame of, generally?
4	Q	Were there both rifle and pistol variants of	4	Α	This is a Glock.
5	the Walt	ther P-1?	5	Q	All right. Do those magazines generally fit
6	Α	Yes.	6	in that p	istol frame?
7	Q	In fact, did Ronald Reagan have a Walther P-1	7	Α	Of this design, yes.
8	carbine	?	8	Q	All right. And that would be a pistol frame
9		MR. WELLS: Objection. Lack of personal	9	then?	
10	knowle	dge.	10	Α	Typically, but can also be a rifle.
11		MR. MAAG: It's on display at his presidential	11	Q	All right. I'm handing you a shoulder stock.
12	museur	n.	12	Does th	nat attach to that pistol frame?
13		MR. WELLS: That's my objection.	13	Α	Yes, it does.
14	Q	(By Mr. Maag) You can answer.	14	Q	Go ahead and attach it. Would then that make
15	Α		15	that a ri	fle?
16	Q	All right. Then that's fine. What's that	16	Α	If it were complete, yes.
17	magazi		17	Q	With the same magazine?
18	Α	That looks like an older European magazine.	18	_	Correct.
19	Q	Are there any markings on it?	19		Is it fair to say there's no discernible
20	Α	There are none.	20		nce no discern ble difference that you can
21	Q	Maybe on the base?	21		te or you can identify between a rifle magazine and
22	A	It looks like a couple numbers. 66-4 or 4-99.	22	-	magazine?
23	Q	Are you able to discern whether that's a rifle	23	_	MR. WELLS: Objection to form.
24	-	tol magazine?	24	-	( )
25	Α	No.	25	Α	Between these magazines, no.
1	Q	Page 134 All right. Handing you another magazine. Are	1	Q	Page 136 The magazines that I have handed to you for
2		y markings on that?	2		tion, other than one other than the Glock and
3	Α	There are.	3		pranded magazine for Glocks, are they the do they
4	Q	What are the markings?	4	appear to	b be for the same firearms?
5	Α	It says M-88, M-100, 308 cal, 243 cal.	5	Α	Yes. These two particular magazines.
6	Q	Are there any other markings on it?	6	Q	Okay. The Glock and the Magpul are?
7	Α	It says Colyer clip on the side.	7	Α	Yes.
8	Q	All right. Are you able to discern whether	8	Q	The other magazines, any of them, are they the
9	that's a	rifle, pistol or shotgun magazine?	9	same as	any of the other magazines that I have handed you?
10	Α	No.	10	Α	They don't appear to be.
11	Q	And I'll hand you another magazine. Are there	11	Q	All right. So it's a wide variety of
12	any ma	rkings on that?	12	magazir	nes?
13	Α	This one is marked FN Manufactured, Inc,	13	Α	Yes.
14	Columi	oia, South Carolina, and a manufacturer code.	14	Q	Okay. Do you recognize that?
15	Q	All right. Are you able to discern whether	15	Α	This appears to be the bolt and carrier from a
16	that's a	rifle, pistol or shotgun magazine?	16	Saiga s	hotgun or similar variant or copy.
17	Α	No.	17	Q	All right. Is that an AK-47 type?
18	Q	Is it possible that that magazine will fit	18	Α	It's a copy of the AK-47 of a 12-gauge variant
19	both rifl	es, pistols or shotguns?	19	of the A	K-47.
20	Α	Yes.	20	Q	All right. And can you describe that for the
21	Q	What type of magazine did I hand you there?	21	record?	What does it look like?
22	Α	This is a Glock magazine.	22	Α	It is a rotating bolt inside of a large
23		All right. And is it similar to this other	23		housing with a handle on the side and a piston on
24	-	ne that I gave you?	24		
25	Α	Yes. This other one is a Magpul brand, Glock	25	Q	All right. Is that what an AK-47 rifle or
1			1		



	Scott	Pula	ski
1	Page 137 pistol bolt and gas piston would look like other than the	1	Page 139 Q Okay. And the Does part of that stock on
	sizes?	2	the front of it, if it was fully assembled, would that
3	MR. WELLS: Objection to form.	3	cover the barrel?
4	Q (By Mr. Maag) You can answer.	4	A It would.
5	A It's made It's modified to accept the	5	Q And would that allow the non-firing hand to
	-	6	_
6	proper ammunition.  O I understand there's dimensional differences.		prevent the firer from burning themselves while holding the
7	,	7 8	firearm with the non-firing hand?  A It would.
8	but I mean, the general description.  A Yes.	9	Q And is the M1 carbine a semi-automatic
9		10	firearm?
10	Q All right. Is that the same Are you		A Yes.
11	familiar with the gas and bolt system of the M1 Garand?	11 12	
12	A Yes.		Q Does it accept a detachable magazine?
13	Q Is that the same general gas and bolt system	13	A It does.
14	of the M1 Garand?	14	Q Therefore, is it fair to say in its original
15	A Yes. The Garand uses a rotating bolt and a	15	configuration, the M1 carbine is prohibited under PICA?
16	long piston.	16	MR. WELLS: Objection. Calls for a legal
17	Q Is it fair to say that other than dimensional	17	conclusion.
18	differences, there is no difference between the gas and	18	Q (By Mr. Maag) You can answer.
19	bolt system of a Garand and an AK-47 type firearm?	19	A Based on my experience and reading PICA, it
20	MR. WELLS: Objection to form.	20	does.
21	Q (By Ms. Helfrich) You can answer.	21	Q Is the M1 carbine in any way, shape or form an
22	A Very similar.	22	AR-type or AK-type firearm?
23	Q You were asked to read part of PICA. Do you	23	A It is not.
24	remember that?	24	Q If AK-47s or AR-15 type firearms were
25	A I do.	25	converted to bolt action or pump action, under PICA could
	Page 138	1	Page 140
1	Q I believe it's Exhibit 9 that was given to	2	they be sold in Illinois?  MR. WELLS: Objection. Calls for a legal
3	you?  A Yes.		conclusion.
4	Q And there was a features definition that I	4	Q (By Mr. Maag) You can answer.
	think you were asked to read at one point; correct?	5	A Because of the definitions of PICA and machine
6	A Yes.		gun parts Or pardon me. Definition of PICA and assault
7	Q Did that include a semi-automatic firearm that		weapon parts, that lower receiver on an AR-15 is considered
8	could accept a detachable magazine and had a pistol grip?		an assault weapon or an assault weapon part.
9	A Yes.	9	Q Who says?
10	Q Are you familiar with that what I have	10	A PICA.
11	handed you?	11	Q And has the state police posted commentary to
12	A I am.	12	that effect on their website?
13	Q What is that, generally?	13	A I believe in the questions and answers page
14	A In general, it's an M1 carbine rifle stock.	14	they got that.
15	Q Does it appear to be a standard M1 carbine	15	Q So it is fair to say that a bolt-action rifle,
16	rifle stock?	16	based on the commentary of the state police on their
17	A It does.	17	website, that look too much like an AR-15 would be
18	Q The grip on that, what would you call that	18	prohibited under PICA?
19	type of grip?	19	A Yes.
20	A The industry refers to it as a pistol grip.	20	Q The same question
21	Q Is that the same type of grip as on an AK-47	21	MR. WELLS: Where is that coming from?
22	or an AR-15?	22	MR. MAAG: Off your client's website.
~~		i	
23	A It's a similar shape and style.	23	MR. WELLS: And do you have a copy of what
	<ul><li>A It's a similar shape and style.</li><li>Q But it doesn't protrude below, does it?</li></ul>		MR. WELLS: And do you have a copy of what you're talking about?
23			•



1		Page 141 MR. WELLS: Have you produced a copy of	1	Α	Page 143 Yes.
2		MR. MAAG: Of your client's website? No, it's	2	Q	Does that look like an AK-type firearm?
3		website.	3	Α	It does not based on the overall shape of it,
4	Q		4	no.	
5	Α	It would be the same answer as an AR-15.	5	Q	If someone were to show that to you Strike
6		MR. MAAG: I didn't write your client's	6	that.	
7	website	· · · · · · · · · · · · · · · · · · ·	7	If	f someone were to say you can't have an
8		MR. WELLS: It's kind of hard to know what	8		Firearm in Illinois, and you were asked about the
9	vou're ta	alking about when I don't have something to look	9	• •	36S, visually would you think that that is an
10	•	i. That's my objection.	10		
11	,	MR. MAAG: Okay. Well, maybe your client will	11	,,	Only if I had intimate knowledge of the
12	take it d	down after you talk to them.			e firearms.
13	Q	(By Ms. Helfrich) You have Exhibit No. 17 in	13	•	And on page 24 of Document 10, at the bottom
14	front of		14		eference to SKS with detachable magazine. Are
15		I do.	15		y parts commonalities that you're aware of between
16	Q	That's the Shooter's Bible cover page?	16		, either with or without a detachable magazine, and
17	A	Yes.	17		that is arguably an AK variant or copy?
18	Q	Are those firearms legal to sell in the State	18	, ,	The only part that would be potentially
19	of Illino	•	19		ingeable would be a sling in a magazine, depending
20	A	Not all of them.	20		letachable magazine conversion kit used.
21	Q	Why not?	21		If someone were to tell you that you could not
22	A	The pistol pictured at the bottom has a	22		pssess an AK-type firearm in the State of Illinois
23		ed barrel and was banned by PICA.	23	•	you were shown an SKS, would that trigger you in
24	Q	Are you familiar with the Beretta AR-100?	24		d that you could not have that SKS?
25	A	Yes.	25	-	That would Well, no. The short answer, no.
23	^	163.		,	That would ston, not the onest another, not
1	Q	Page 142 Is that an AR-type firearm?	1	Q	Page 144 On page 28 of Exhibit 10.
2	A	Let me find the page, please.	2		MR. WELLS: Sorry. I'm just trying to help.
3	Q	Not asking if it's listed.	3		MR. MAAG: That's okay. I'll wait for you.
4	Α	I'm sorry. No, it's not. It just shares a	4		MR. WELLS: Actually, you know, what, they are
5	basic sh		5		e. I'm sorry. Here we go.
6	Q	Are you familiar with the Mauser c96 broom	6	-	(By Mr. Maag) Page 28. You were asked about
7		vith fixed 20-round magazine?	7		aLite M15 .22 LR carbine?
8		I am.	8		Yes.
9	Q	What vintage is that?	9	Q	Does that even have a gas system?
10	Α	Pre 1900s.	10	Α	No.
11	Q	That's literally designed and made in the	11	Q	The gas system on a standard AR-15 is designed
	1800s?	,g	12		e Stoner when he was at ArmaLite back in the '50s,
13		Yes.	13	•	at have a gas system?
14		And is that listed on Exh bit No. 10, page 12,	14		The ArmaLite AR-15, yes.
15		g illegal in Illinois under PICA?	15		All right. We taked about the Beretta AR-70,
16		Yes.	16		hmaster ACR. Is that in any way, shape or form an
17		You were asked about the Norinco 86S. Are you	17		
18		with that particular firearm?	18	A	
19		Not having handled it a lot, but with the	19	Q	Why not?
		lea of it, yes.	20	A	It was designed from the ground up apart from
		And Exhibit No. 10, page 23, there's a	21	an AR-	
20		· -	22		
<b>20</b> 21		anh of it?			
<b>20</b> 21 22	photogr	aph of it?		_	All right. Is the gas system the same?  No. It uses a piston instead of direct gas.
20 21 22 23	photogr	Yes.	23	Α	No. It uses a piston instead of direct gas.
<b>20</b> 21 22	photogr <b>A</b> Q			_	



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-0 (	3, 002	Scott	Pula	aski	age 00 01 200 1 age 12 110000
1	Q	Page 145 The AR-15, does it have a detachable pistol	1	Q	Page 147 Is the H&K 94 a rifle version of the SP5?
	grip?	The AR-15, does it have a detachable pistor	2	A	It is.
3	grip:	The AR-15 does.	3	Q	Do they use the same magazine?
4	Q	Does the Bushmaster ACR have a detachable	4	A	They do.
5	pistol gri		5	Q	Is it legal if you own both a rifle and a
6		ાt does not.	6		rsion of those firearms to purchase or possess a
7	Q	Page 30, the Chiappa Firearm M4 rifles. Kind	7	-	d magazine?
8		like a US M4 carbine?	8		You would have to have the pistol variant.
9		Yes.	9		uld have to own the pistol variant to be legal.
10			10		,
-		Does it have a gas system?			All right. And then could you, as a dealer,
11		It doesn't appear to.	11		15-round magazine to somebody that said I want a
12	Q	Is it in any way, shape or form an AR-type	12	_	ne for my H&K 94?
13		as you understand it?	13		No.
14		Since they are type of a firearm with gas	14		Now, the ban prohibits possession of and
15	system		15		of the magazine; correct?
16		Page 32, the Heckler & Koch MR 556. Does that	16	A	
17		ny direct gas impingement system like an AR-15?	17	. Q	It doesn't prohibit inserting a magazine into
18	Α	It uses a piston.	18	•	firearm, does it?
19	Q	We taked about that already. We talked about	19	_	Presumably, no.
20		ne Ruger AR 556, does that have a gas impingement	20	Q	So how would the owner of an H&K 94 and an SP5
21	or gas p		21		at they were legal buying a 15-round magazine?
22	Α	AR 556 has a impingement gas.	22	Α	They would not.
23	Q	Does Ruger make a gas piston version?	23	Q	, 9
24	Α	I do. It's called the SR 556.	24		SUB2000. Do versions of that accept Glock
25	Q	All right. So the Ruger SR 556 would be	25	magazii	nes?
		Page 146			Page 148
		than an AR-15 as designed by Gene Stoner because	1	A	Yes.
		gas system and not a gas impingement system?	2	Q	Do versions of that accept CZ 75 magazines?
3		Yes.	3	A	Yes, they do.
4		MR. WELLS: What page are you on, Tom?	4	Q	Is there a wide variety of otherwise, quote
5		MR. MAAG: I'm not even looking at anything.	5		, pistol magazines that the Kel-Tec SUB2000 will
	I'm just -		6	accept?	
7		MR. WELLS: Riffing.	7	_	MR. WELLS: Object to form. Vague.
8		(By Mr. Maag) I'm trying to skip over stuff	8	Q	(By Mr. Maag) You can answer.
9	•	e already ta ked about because I don't want to be	9	Α	The SUB2000 accepts at least six different
10		y more than you do. The Beretta cX 4 on page 43.	10	magazi	
11	Α	Yes.	11	Q	Do you know which six offhand?
12	Q	Does that take the same magazine as the	12	Α	
13		.92 pistol?	13		field Armory and others, I believe.
14	Α	Yes.	14	Q	All right. Are you familiar with the
15	Q	Is that a rifle?	15		Wesson military and police pistol?
16	Α	It is.	16	Α	Yes.
17	Q	You were asked about Let me follow it here.	17	Q	Are you aware of the carbine that
18		In Document 17, page 363, about the Heckler &	18	Smith &	Wesson came out with relatively recently, I guess
19	Koch SI	P5 pistol.	19	•	r, that accepts military and police magazines?
20	Α	Yes.	20	Α	Yes, they are folding carbine.
21	Q	In Document No. 10, page 47, it makes	21	Q	Very good. That's an article in the American
22	reference	ce to the H&K 94?	22	Riflema	n on it sometime this year. Are there rifle and
23	Α	Yes.	23	pistol ve	ersions of the Uzi?
24	Q	Are you familiar with those firearms?	24	Α	Yes.
25	Α	I am.	25	Q	Are the magazines the same?



A They are.   Page 140		Scott Pulaski					
2	1		9 1				
3 Ruger 10/22? 4 A There are. 5 Q Are the magazines the same? 6 A They are. 8 13-round magazine in a given caliber, pick the caliber, it 19 really doesn't matter, and asked you whether or not that 21 magazine was legal in the State of Illinois, without 11 knowing more, could you answer that question under PICA? 12 A No. 13 Q Why not? 14 A Because pistol — a pistol or rifle magazine 15 could fit either potentially. 15 could fit either potentially. 16 Q So it potentially could be legal if it was a rifle 17 pistol magazine? 18 A Yes. 19 Q Could potentially be illegal if it was a rifle 18 magazine was legal in the State of Illinois without 11 knowing more, could you answer that question under PICA? 17 Q (By Mr. Magg) All right. What have I handed 18 you? 18 A These are lower and upper receivers for 10 different versions, copies of the AR-15 or AR 10. 11 Q All right. The one closest to you on your 12 left, what is the manufacturer and model of that? 18 A This is an Aero Precision M4 E1. 19 Q Could potentially be illegal if it was a rifle 12 magazine? 10 Q Anywhere on that does it say AR in any way, 15 shape or form? 10 A No. 11 pistol magazine? 12 A Yes. 12 Q And there's no way discern the two? 13 A This is an Aero Precision M4 E1. 14 The M4 E1 is not listed. 15 Q All right. Is that — And feel free to look 18 at the Exhibit 9, if you need to, to refresh your 19 recollection. Is that fire — Is that receiver listed on 19 recollection. Is that fire — Is that receiver listed on 19 recollection. Is that fire — Is that receiver listed on 19 recollection. Is that fire — Is that receiver listed on 19 recollection. Is that fire — Is that receiver listed on 19 recollection. Is that fire — Is that receiver listed on 19 recollection. Is that fire — Is that receiver listed on 19 recollection. Is that fire — Is that receiver listed on 19 recollection. Is that fire — Is that receiver listed on 19 rece	2	-					
5 Q Are the magazines the same? 6 A They are. 9 Gispance were to just randomly hand you a 8 13-round magazine in a given caliber, pick the caliber, it really doesn't matter, and asked you whether or not that magazine was legal in the State of Illinois, without 11 knowing more, could you answer that question under PICA? 13 Q Why not? 14 A No. 15 A Because platol - a pistol or rifle magazine could fit either potentially. 16 Q So it potentially could be legal if it was a 17 pistol magazine? 17 pistol magazine? 18 A Yes. 19 Q Could potentially be illegal if it was a rifle 20 magazine? 21 A Yes. 22 Q And there's no way discern the two? 23 A Not without having the Individual firearms in 14 front of you. 25 Q And even if you have the individual firearms in 14 front of you. 26 Q Ores Ruger make a version of the Mini-14 of that	3	•					
6 A It would be very difficult. 7 C If someone were to just randomly hand you a 8 3-round magazine in a given caliber, pick the caliber, it 9 really doesn't matter, and asked you whether or not that 10 magazine was legal in the State of Illinois, without 11 knowing more, could you answer that question under PICA? 12 A No. 13 Q Why not? 14 A Because pistol – a pistol or rifle magazine 15 could fit either potentially. 16 Q So it potentially could be legal if it was a rifle 17 pistol magazine? 18 A Yes. 18 A Yes. 19 Q Could potentially be illegal if it was a rifle 20 magazine? 21 A No. 22 Q And there's no way discern the two? 23 A Not without having the individual firearms in 24 front of you. 25 Q And even if you have the individual firearms, 26 A Yes, or A Yes on A Yes you familiar with the Sturm, Ruger & 27 A Correct. 28 A Correct. 29 Q And word amiliar with the Sturm, Ruger & 30 Q Are you familiar with the Sturm, Ruger & 40 Company Mini-14 tactical rifle M-14-20CF? 51 A Yes, or Does Ruger make a version of the Mini-14 57 that – Well, okay. Can you descr be the tactical rifle to 58 me? 59 A The tactical version has different cotor 10 furniture, different features on it that would be 11 considered banned by PICA, such as adjustable stocks or 12 sometimes pistol grips. 13 Q Does Ruger also make a plain version in a 14 traditional wooden stock? 15 A They do. 16 Q Would that be classified as a copy duplicate to various process of the AR-15 receiver? 19 A Thous PICA sould be. 10 Q Hiright. What have I handed 18 3you? 19 A These are lower and upper receivers for different versions, copies of the AR-15 or AR 10. 11 Q All right. Tho one closes to you your pour 12 left, what is the manufacturer and model of that? 11 A This is an Are-16 version Me E1. 14 A Thou Mat is the manufacturer and model of that? 15 A The Mat is the manufacturer and model of that? 16 A No. 17 Q All right. Tho one closes to you your person to discommend the Mini-14 18 there evold potentially be illegal in liture. 19 A Ves. 20 Q This that the would r	4	A There are.	4	MR. WELLS: Objection. Form. Calls for a			
7 Q (By Mr. Maag) All right. What have I handed 8 13-round magazine in a given caliber, pick the caliber, it 9 really dosorn matter, and asked you whether or not that 10 magazine was legal in the State of Illinois, without 11 knowing more, could you answer that question under PICA? 12 A No. 13 Q Why not? 14 A Because platol – a pistol or rifle magazine 15 could fit either potentially. 16 Q So it potentially could be legal if it was a 17 Q All right. The one closest to you on your 18 A Yes. 19 Q Could potentially be illegal if it was a rifle 19 Q Could potentially be illegal if it was a rifle 19 magazine? 10 Q Could potentially be illegal if it was a rifle 19 magazine? 10 Q Anywhere on that does it say AR in any way, 15 shape or form? 16 A No. 17 Q All right. The one closest to you on your 18 A Yes. 19 Q Could potentially be illegal if it was a rifle 19 magazine? 10 Could preintially be illegal if it was a rifle 20 magazine? 21 A Yes. 22 Q And where is no way discern the two? 23 A Not without having the individual firearms in 24 front of you. 25 Q And even if you have the individual firearms in 26 front of you. 27 Q And even if you have the individual firearms in 28 front of you. 29 Q And even if you have the individual firearms in 29 Q Correct. 20 Q And even if you have the individual firearms in 20 A rey our familiar with the Sturm, Ruger & 21 A Correct. 22 Q And even if you descr be the tactical rifle to 23 MR Ves. 24 Company Mini-14 tactical rifle M-14-20CF? 25 A Yes. 26 Q Dese Ruger make a version of the Mini-14 27 thatWell, okay. Can you descr be the tactical rifle to 28 magazine pistol grips. 29 A The tactical version has different color 29 furniture, different features on it that would be 20 considered banned by PICA, such as adjustable stocks or 21 traditional wooden stock? 22 A They do. 23 MR Ves. 24 A Yes. 25 Q Thus, PICA could very well prohibit a standard 26 right above that, is that an AR-15 receiver? 27 A Yes. 28 MR VELLS: Object to form. Calls for a legal 29 Q Thus, PICA could very well prohib	5	Q Are the magazines the same?	5	legal conclusion.			
8 13-round magazine in a given caliber, pick the caliber, it 9 really doesn't matter, and asked you whether or not that 10 magazine was legal in the State of Illinois, without 11 knowing more, could you answer that question under PICA? 12 A No. 13 Q Why not? 14 A Because pistol a pistol or rifle magazine 15 could fit either potentially. 15 could fit either potentially could be legal if it was a 16 Q So if potentially could be legal if it was a rifle 17 pistol magazine? 18 A Yes. 18 A Yes. 19 Q Could potentially be illegal if it was a rifle 20 magazine? 21 A Yes. 22 Q And there's no way discern the two? 23 A Not without having the individual firearms in 24 front of you. 25 Q And even if you have the individual firearms in 26 A Correct. 3 Q Are you familiar with the Sturm, Ruger & 4 Company Mni-14 stactical rifle M-14-20CF? 5 A Yes. 6 Q Does Ruger make a version of the Mni-14 7 thatWell, okay. Can you describ the tactical rifle to 8 me? 9 A The tactical version has different color 10 furniture, different features on it that would be 11 considered banned by PICA, such as adjustable stocks or 12 sometimes pistol grips. 13 Q Does Ruger also make a plain version in a 14 traditional wooden stock? 15 A They do. 16 Q So duild hat be classified as a copy duplicate 17 variant or altered facismile of a Ruger Mini-14 stactical 18 rifle? 19 A It could be. 10 Q Thus, PICA could very well prohibit a standard 21 Ruger Mini-14? 22 A Yes. 23 MR. WELLS: Object to form. Calls for a legal 24 conclusion.	6	A They are.	6	A It would be very difficult.			
9 really doesn't matter, and asked you whether or not that 10 magazine was legal in the State of Illinois, without 11 knowing more, could you answer that question under PICA? 12 A No. 13 Q Why not? 14 A Beause pistol — a pistol or rifle magazine 15 could fit either potentially. 16 Q So it potentially could be legal if it was a 17 pistol magazine? 18 A Yes. 19 Q Could potentially be illegal if it was a rifle 19 magazine? 19 Q Could potentially be illegal if it was a rifle 20 magazine? 21 A Yes. 22 Q And there's no way discern the two? 23 A Not without having the individual firearms in 24 front of you. 25 Q And even if you have the individual firearms in 26 Correct. 27 A Correct. 28 Q Correct. 3 Q Are you familiar with the Sturm, Ruger & 4 Company Min-14 tactical rifle M-14-20CF? 5 A Yes. 6 Q Does Ruger make a version of the Min-14 that — Well, okay. Can you describe the tactical rifle to 8 me? 9 A The tactical version has different color 10 furniture, different features on it that would be 11 considered banned by PICA, such as adjustable stocks or 12 sometimes pistol grips. 13 Q Does Ruger make a version of the Min-14 traditional wooden stock? 15 A They do. 16 Q Would that be classified as a copy duplicate 17 variant or altered facsimile of a Ruger Mini-14 tactical 18 rifle? 19 A It could be. 20 Q Thus, PICA could very well prohibit a standard 21 Ruger Mini-14? 22 A Yes. 23 MR. WELLS: Object to form. Calls for a legal 24 conclusion.	7	Q If someone were to just randomly hand you a	7	Q (By Mr. Maag) All right. What have I handed			
10 magazine was legal in the State of Illinois, without 11 knowing more, could you answer that question under PICA? 12 A No. 13 Q Why not? 14 A Because pistol — a pistol or rifle magazine 15 could fit either potentially. 16 Q So it potentially. 17 pistol magazine? 18 A Yes. 18 A Yes. 19 Q Could potentially be illegal if it was a rifle 19 Q Could potentially be illegal if it was a rifle 20 magazine? 21 A Yes. 22 Q And there's no way discern the two? 23 A Not without having the individual firearms in 24 from of you. 25 Q And even if you have the individual firearms. 26 A Correct. 27 A Correct. 28 A Yes. 29 A A rey ou familiar with the Sturm, Ruger & 4 Company Min-14 tactical rifle M-14-20CF? 4 A Yes. 4 Company Min-14 tactical rifle to Lack and the substantially similar with the A Yes. 5 A Yes. 6 Q Does Ruger make a version of the Min-14 that — Well, okay. Can you descr be the tactical rifle to considered banned by PICA, such as adjustable stocks or furniture, different features on it that would be 10 considered banned by PICA, such as adjustable stocks or furniture, different features on it that would be 11 considered banned by PICA, such as adjustable stocks or furniture, different features on it that would be 12 Q Thus, PICA could very well prohibit a standard 18 rifle? 19 A It could be. 10 Q Thus, PICA could very well prohibit a standard 18 rifle? 19 A It could be. 10 Q Inight. The one closest to you on your your file left, was a file left, what is the manufacture and model of that? 16 In A No. 17 Q All right. The one closest to you on your your file left, was a file of the child was a file of the considered facsimile of a Ruger Min-14 tactical file to the file of the fil	8	13-round magazine in a given caliber, pick the caliber, it	8	you?			
11   Rowing more, could you answer that question under PICA?   12   A No.   12   left, what is the manufacturer and model of that?   13   A This is an Aero Precision Mid E1.   14   Q Anywhere on that does it say AR in any way.   15 could fit either potentially.   15 shape or form?   16   Q So it potentially could be legal if it was a   16   A No.   17 pistol magazine?   18   A Yes.   18   A Yes.   19   Q Could potentially be illegal if it was a rifle   19   Q Could be rifle and pistol variants in both of those?   20   Q Sut that would require them to know what an AR-15 lower looked like?   20   Q Sut that would require them to know what an AR-15 lower looked like   20   Q Could have be a bett ocisioned by PiCA, such as adjustable stocks or potent	9	really doesn't matter, and asked you whether or not that	9	A These are lower and upper receivers for			
12   A No. 13   A Why not? 14   A Because pistol a pistol or rifle magazine 15   could fit either potentially. 16   Q So it potentially could be legal if it was a rifle 17   pistol magazine? 18   A Yes. 19   Q Could potentially be illegal if it was a rifle 20   magazine? 21   A Yes. 22   Q And there's no way discern the two? 23   A Not without having the individual firearms in 24   front of you. 25   Q And even if you have the individual firearms, 26   Q Are you familiar with the Sturm, Ruger & 27   A Correct. 28   A Yes. 29   A A Correct. 20   Q Are you familiar with the Sturm, Ruger & 3   Q Are you familiar with the Sturm, Ruger & 4   Company Mini-14 tactical rifle M-14-20CF? 5   Q Does Ruger make a version of the Mini-14 7   that Well, okay. Can you descr be the tactical rifle to 18   me? 29   A The tactical version has different color 19   G Does Ruger also make a plain version in a 14   traditional wooden stock? 15   A They do. 16   Q Would that be classified as a copy duplicate 17   variant or altered facsimile of a Ruger Mini-14 tactical 18   rifle? 20   Q Thus, PiCA could very well prohibit a standard 21   Ruger Mini-14? 22   A Yes. 23   M R. WELLS: Object to form. Calls for a legal 24   Conclusion. 25   Q Is that an AR-10 receiver? 26   Q Is that no AR-15 receiver? 27   Q Is that an AR-10 receiver? 28   A Ves. 39   A It is not. 30   O Results and make a plan version in a standard 29   A The tactical version has different color 30   Q Does Ruger also make a plain version in a standard AR-15 lower, is it not? 30   Q Does Ruger also make a plain version in a standard of the plane and place. 30   Q Does Ruger also make a plain version in a standard AR-15 lower, is it not? 31   Q Does Ruger also make a plain version in a standard of AR-15 lower, is it not? 32   Q Does Ruger also make a plain version in a standard of AR-15 lower, is it not? 39   A It could be. 30   Q Does Ruger also make a plain version in a standard of AR-15 lower, is it not? 30   Q Does Ruger also make a plain version in a standard o	10	magazine was legal in the State of Illinois, without	10	different versions, copies of the AR-15 or AR 10.			
13 A This is an Aero Precision M4 E1.  14 Q Anywhere on that does it say AR in any way,  15 shape or form?  16 A No.  17 pistol magazine?  18 A Yes.  19 Q Could potentially be illegal if it was a rifle  20 magazine?  21 A Yes.  22 Q And there's no way discern the two?  23 A Not without having the individual firearms in  24 front of you.  25 Q And even if you have the individual firearms in  26 Company Mini-14 tactical rifle M-14-20CF?  27 A Yes.  28 A Correct.  29 Q And even if you have the individual firearms in  20 Q Equipment of the precision of the Mini-14  21 There's a trigger make a version of the Mini-14  22 Q Anywhere on that does it say AR in any way,  15 shape or form?  16 A No.  17 Q All right. Is that And feel free to look  18 at the Exhibit 9, if you need to, to refresh your  19 recollection. Is that fire Is that receiver listed on  20 the PICA banned list?  21 A The M4 E1 is not listed.  22 Q Simply by looking at Exh bit No. 9, the PICA  23 statute, is there any way for a person to discern whether  24 that lower receiver is legal or illegal in Illinois?  25 A Because it is substantially similar, they  26 But that would require them to know what an  27 A Yes.  28 A Yes.  29 Q And even if you descr be the tactical rifle to  29 But that would require them to know what an  20 A Yes.  21 Conded I ke, would they be able to discern that?  22 A Not without guidance potentially.  23 A Not without guidance potentially.  24 A Not without guidance potentially.  25 Q And if they didn't know what an AR-15 lower  26 looked I ke, would they be able to discern that?  27 A Not without guidance potentially.  28 A Secuse of the string like the magazine well are opened up  29 Largery Mini-14  20 A They do.  20 Q Hinght. And set that one down. The one  21 traditional wooden stock?  21 A The M2 E1  22 A No.  23 Q All right. And set that one down. The one  24 traditional wooden stock?  25 A Secuse of the secular right and piece.  26 A Occording the secular right and piece.  27 A Not without guidance potentially.  2	11	knowing more, could you answer that question under PICA	? 11	Q All right. The one closest to you on your			
14 Q Anywhere on that does it say AR in any way, 15 could fit either potentially. 16 Q So it potentially could be legal if it was a 17 pistol magazine? 18 A Yes. 19 Q Could potentially be illegal if it was a rifle 19 Q Could potentially be illegal if it was a rifle 19 Q Could potentially be illegal if it was a rifle 19 magazine? 21 A Yes. 22 Q And there's no way discern the two? 23 A Not without having the individual firearms in 24 front of you. 25 Q And even if you have the individual firearms. 26 Q And oven if you have the individual firearms. 27 A Correct. 28 A Correct. 29 A Correct. 20 Q Does Ruger make a version of the Mini-14 20 That — Well, okay. Can you descr be the tactical rifle to 21 mer? 22 mer A The tactical version has different color 23 furniture, different features on it that would be 24 traditional wooden stock? 25 A They do. 26 Q Would that be classified as a copy duplicate traditional wooden stock? 27 variant or altered facsimile of a Ruger Mini-14 tactical 28 Ruger Mini-14? 29 Q Thus, PICA could very well prohibit a standard 21 Ruger Mini-14? 22 A Yes. 25 Q Thus, PICA could very well prohibit a standard 26 Conclusion. 26 A Yes. 27 A It is not. 28 A Correct. 39 A The tactical version has different color 40 furniture, different features on it that would be 41 considered banned by PICA, such as adjustable stocks or 19 a standard AR-15 lower, is it nor? 41 traditional wooden stock? 42 Things like the magazine well are opened up 43 larger. There's a trigger guard that is in place where a 19 a traditional holes drilled and pins used or 16 screws used instead of pins in a few places. 43 Yes. 44 Q Mould that be classified as a copy duplicate 19 A Yes. 45 Q Mould that preciver and an AR-15 receiver? 46 A No. 47 Yes. 48 A Yes. 59 Q A Ruger Mini-14 tactical rifle to 19 A Yes. 50 Q All right. And set that one down. The one 21 right above that, is that an AR-10 receiver? 50 A No. 51 A The substantially way. 52 A Correct. 53 A The substantially similar they into way that it is a banned item. 54 Correct. 5	12	A No.	12	left, what is the manufacturer and model of that?			
15 could fit either potentially.  16 Q So it potentially could be legal if it was a 17 pistol magazine?  17 pistol magazine?  18 A Yes.  19 Q Could potentially be illegal if it was a rifle 20 magazine?  21 A Yes.  22 Q And there's no way discern the two? 23 A Not without having the individual firearms in 24 front of you.  25 Q And even if you have the individual firearms,  26 Q And even if you have the individual firearms,  27 Page 150  1 there could be rifle and pistol variants in both of those?  28 A Correct.  29 Q And even if you have the individual firearms,  29 Page 150  1 there could be rifle and pistol variants in both of those?  20 A Correct.  31 Q Are you familiar with the Sturm, Ruger & 4 Company Mini-14 tactical rifle M-14-20CF?  52 A Yes.  53 Q Does Ruger make a version of the Mini-14 54 that - Well, okay. Can you descr be the tactical rifle to 55 A The tactical version has different color 56 10 furniture, different features on it that would be 17 considered banned by PICA, such as adjustable stocks or  10 furniture, different features on it that would be 17 variant or altered facsimile of a Ruger Mini-14 tactical rifle?  10 A It is.  11 Could presume that it is a banned item.  12 Page 152  13 A Yes.  14 Company Mini-14 tactical rifle to 16 variant or in the Mini-14 traditional wooden stock?  15 A They do.  16 Q Would that be classified as a copy duplicate 17 variant or altered facsimile of a Ruger Mini-14 tactical rifle rifle?  18 A It could be.  19 A It could be.  20 Q Thus, PICA could very well prohibit a standard 21 Ruger Mini-14?  21 A Yes.  22 A Yes.  23 MR. WELLS: Object to form. Calls for a legal 24 conclusion.	13	Q Why not?	13	A This is an Aero Precision M4 E1.			
16	14	A Because pistol a pistol or rifle magazine	14	Q Anywhere on that does it say AR in any way,			
17 pistol magazine? 18	15	could fit either potentially.	15	shape or form?			
18 at the Exhibit 9, if you need to, to refresh your 19 recollection. Is that free - Is that receiver listed on 20 magazine? 21 A Yes. 22 Q And there's no way discern the two? 23 A Not without having the individual firearms in 24 front of you. 25 Q And even if you have the individual firearms, 26 Q And even if you have the individual firearms, 27 A Correct. 28 A Correct. 29 Q And even if you have the individual firearms, 29 A Correct. 20 Q Des Ruger make a version of the Mini-14 20 That - Well, okay. Can you descr be the tactical rifle to 21 me? 22 A The tactical version has different color 23 for furniture, different features on it that would be 24 traditional wooden stock? 25 A They do. 26 Q Would that be classified as a copy duplicate rivariant or altered facsimile of a Ruger Mini-14 tactical rifle? 27 A They do. 28 A They do. 29 Q Thus, PICA could very well prohibit a standard 21 Ruger Mini-14? 20 Q Thus, PICA could very well prohibit a standard 21 Ruger Mini-14? 21 A The M4 E1 is not listed. 22 Q Simply by looking at Exh bit No. 9, the PICA statute, is there any way for a person to discern whether 24 that lower receiver is legal or illegal in Illinois? 24 A Because it is substantially similar, they 25 A Because it is substantially similar, they 26 a Because it is substantially similar, they 27 Could presume that it is a banned item. 28 Q But that would require them to know what an AR-15 lower looked like? 4 A Yes. 5 Q And if they didn't know what an AR-15 lower looked like? 4 A Yes. 6 Q And that receiver, in fact, is different than 9 a standard AR-15 lower, is it not? 7 A Not without guidance potentially. 8 Q And that receiver is egal or illegal in Illinois? 7 A Not without guidance potentially. 8 Q And that receiver is egal or illegal in Illinois? 9 A The M4 E1 is not liked. 9 Could presume that it is a banned item. 9 A Yes. 10 Q But that would require them to know what an AR-15 lower looked like? 11 Could presume that it is a banned item. 12 Q But that would require them to know what an AR-15 lower looke	16	Q So it potentially could be legal if it was a	16	A No.			
19  Q Could potentially be illegal if it was a rifle 20 magazine? 21  A Yes. 22  Q And there's no way discern the two? 23  A Not without having the individual firearms in 24 front of you. 25  Q And even if you have the individual firearms, 26  Q Are you familiar with the Sturm, Ruger & 27  A Correct. 28  A Yes. 29  Q Are you familiar with the Sturm, Ruger & 30  Q Are you familiar with the Sturm, Ruger & 40  Company Mini-14 tactical rifle M-14-20CF? 41  A Yes. 42  Q Does Ruger make a version of the Mini-14 43  That Well, okay. Can you descr be the tactical rifle to 44  The M4 E1 is not listed. 45  Q Simply by looking at Exh bit No. 9, the PICA statute, is there any way for a person to discern whether that lower receiver is legal or illegal in Illinois? 45  A Because it is substantially similar, they 46  Company Mini-14 tactical rifle M-14-20CF? 47  A Yes. 48  Q Does Ruger make a version of the Mini-14 49  That Well, okay. Can you descr be the tactical rifle to 40  Tourniture, different features on it that would be 41  considered banned by PICA, such as adjustable stocks or 41  traditional wooden stock? 41  traditional wooden stock? 42  A They do. 43  A They do. 44  A Yes. 45  Q And that receiver listed on 46  Let would resume that it is a banned item. 47  A Yes. 48  A Yes. 49  Q But that would require them to know what an 49  A The tactical rifle to 40  A Yes. 40  A Yes. 41  A Yes. 51  A Recause it is substantially similar, they 52  Q But that would require them to know what an 53  AR-15 lower looked like? 54  A Yes. 55  A A He Yes. 56  Q Does Ruger make a version of the Mini-14 75  that Well, okay. Can you descr be the tactical rifle to 57  A The M4 E1 is not listed. 58  A Because it is substantially similar, they 59  A Yes. 50  Q And if they didn't know what an AR-15 lower looked like? 50  Q And that receiver, in fact, is different than 51  a stantage with a substantially similar, they 51  A Not without guidance potentially. 52  Q But that would require them to know what an 53  AR-15 lower looked like	17	pistol magazine?	17	Q All right. Is that And feel free to look			
20 magazine? 21 A Yes. 22 Q And there's no way discern the two? 23 A Not without having the individual firearms in 24 front of you. 25 Q And even if you have the individual firearms, 26 Q And even if you have the individual firearms, 27 A Correct. 28 Q Are you familiar with the Sturm, Ruger & 4 Company Mini-14 tactical rifle M-14-20CF? 4 A Yes. 4 Company Mini-14 tactical rifle M-14-20CF? 5 A Yes. 6 Q Does Ruger make a version of the Mini-14 7 that Well, okay. Can you descr be the tactical rifle to 8 me? 9 A The tactical version has different color 10 furniture, different features on it that would be 11 considered banned by PICA, such as adjustable stocks or 15 A They do. 16 Q Would that be classified as a copy duplicate 17 variant or altered facsimile of a Ruger Mini-14 tactical 18 rifle? 19 A It could be. 20 Q Thus, PICA could very well prohibit a standard 21 Ruger Mini-14? 22 A Yes. 22 A Yes. 23 the PICA banned list? 24 A The MA E1 is not listed. 26 Simply Mey for a person to discern whether 26 a Statute, is there any oway for a person to discern whether 27 that lower receiver is legal or illegal in Illinois? 28 A Because it is substantially similar, they 29 A Text would require them to know what an 3 AR-15 lower looked like? 4 A Yes. 5 Q And if they didn't know what an AR-15 lower 6 looked I ke, would they be able to discern that? 7 A Not without guidance potentially. 8 Q And that receiver, in fact, is different than 9 a standard AR-15 lower, is it not? 10 A It is. 11 Q How is it different? 12 A Things like the magazine well are opened up 13 larger. There's a trigger guard that is in place where a 14 standard AR-15 receiver uses an inserted pin and piece. 15 There's also additional holes drilled and pins used or 16 screws used instead of pins in a few places. 17 Q Okay. So there are identifiable differences 18 between that receiver and an AR-15 receiver? 19 A Yes. 20 Q All right. And set that one down. The one 21 right above that, is that an AR-15 receiver? 22 A Yes. 23 MR. WELLS: Object to form. Calls fo	18	A Yes.	18	at the Exhibit 9, if you need to, to refresh your			
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12 sometimes pistol grips.  13 Q Does Ruger also make a plain version in a 14 traditional wooden stock?  15 A They do. 16 Q Would that be classified as a copy duplicate 17 variant or altered facsimile of a Ruger Mini-14 tactical 18 rifle? 19 A It could be. 20 Q Thus, PICA could very well prohibit a standard 21 Ruger Mini-14? 22 A Yes. 23 MR. WELLS: Object to form. Calls for a legal 24 conclusion.  12 A Things like the magazine well are opened up 13 larger. There's a trigger guard that is in place where a 14 standard AR-15 receiver uses an inserted pin and piece. 15 There's also additional holes drilled and pins used or 16 screws used instead of pins in a few places. 17 Q Okay. So there are identifiable differences 18 between that receiver and an AR-15 receiver? 19 A Yes. 20 Q All right. And set that one down. The one 21 right above that, is that an AR-15 receiver? 22 A No. 23 Q Is that an AR-10 receiver? 24 A It is not.		•					
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25 Q (By Mr. Maag) Is there any way for a person to 25 Q Are you able to discern what that is?	24	,	24				
·	25	Q (By Mr. Maag) Is there any way for a person to	25	Q Are you able to discern what that is?			
				*			



Page 153 Page 155 John Carpenter from Escape from New York and took the A It is a copy of an AR-15 receiver that would 2 2 accept only, it looks like, Glock magazines. handgrips off of it, would that then potentially be a legal 3 Q All right. And do you want to try it with a firearm in the State of Illinois, aside from the fact Glock magazine or are you fairly certain it accepts Glock whether or not it's covered by name as a copy or duplicate? 5 magazines? 5 MR. MAAG: Objection to form. Compound. Legal conclusion. 6 A I would presume on the shape and style of it 6 7 that it would, but I can. 7 Q (By Mr. Maag) You can answer. 8 Q Okay. Simply by looking at that lower 8 A If it had -- If it was not meeting the receiver, is there any way, shape or form for a person of features definitional ban, then potentially. 9 10 ordinary intelligence to determine whether or not based on 10 Q Okay. Can you look at the next receiver in 11 the statute in PICA whether that is a banned item? front of you? The next lower receiver. Does that say 12 MR. WELLS: Objection to form. Calls for a AR-15, AR-10 or anything remotely similar to that on there? 12 13 legal conclusion. 13 It does not. All right. And is that listed by make and 14 Q (By Mr. Maag) You can answer. 14 Q 15 A This would be presuming that somebody had 15 model in the PICA banned list? 16 familiarity with PICA and with the differences between 16 Δ No. 17 Q And what is the brand name on that? 17 AR-15s and 9 millimeter copies of AR-15s. 18 Q So how would they determine that that would 18 Benbow City Sports. 19 be -- would or would not be an AR-15 under PICA? 19 O And what's the model? 20 Model EE. 20 A I don't know that they could easily. Α 21 Q Can you think of any way you would do so, All right. And you have got an upper receiver 21 22 22 in front of you? simply --23 23 A No. I would say that it would be something Α I do. Does that fit that model EE? 24 that could be made into a rifle with banned features. 24 0 25 25 All right. Aside from the fact you could It appears to. Page 156 Page 154 conceivably assemble it and do it right with banned All right. Can you try it? Are you satisfied features, could you assemble it to a rifle without banned that they match? 2 3 features? 3 Α Yes. 4 Potentially, yes. Α 4 All right. Can you try attaching the upper 5 Okay. Either of the next lowers, it doesn't receiver on the Palmetto State Armory lower? And if you really matter which one. What is that one? 6 need to remove those plastic ties, feel free. Is that a 6 7 This is a Palmetto G3 E10. 7 match? Is that -- Does that say on there AR, AR-15, 8 It is not. 9 AR-10, or anything like that? 9 And why is that not a match? 10 No. 10 Α Because it's large gap in the back. While 11 Q Is that an AR-15? 11 they may potentially fit together, they wouldn't necessarily safely function. 12 It is not. 12 13 Is that by name banned under PICA? 13 All right. Is it fair to say one is not a I don't believe so. I would have to refer to 14 Α 14 copy or a duplicate of the other, the lowers? 15 the list. 15 Yes. Δ 16 All right. You don't recall seeing it on the And are you familiar with the original AR-10? Q 16 Q 17 list? 17 Α Fairly. 18 A I don't recall seeing the Palmetto G3 E10 on 18 Q Was it semi-automatic, select fire or 19 the list. otherwise? 19 20 Could that be assembled, assuming that it was 20 Select fire, if I recall, Α not banned by named item, into a legal firearm under PICA? 21 And where was it made? 21 O 22 It could be assembled into a bolt-action 22 Α It was in the U.S. 23 firearm or a single-shot-only firearm. 23 Okay. Are you able to -- Are those receivers, 24 Q All right. If it didn't have pistol grips, a any of those receivers in front of you, compatible with flash suppressor, sliding stock, and you took a gueue from that original AR-10?



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	JV 002	Scott F	ula	aski	age 41 01 200 1 age 15 70001
1	Α	Page 157  Not without confirming that it would fit. I	1	Q	Page 159 When customers come to you to purchase a
2	wouldn	't be able to tell just from these parts. You can	2	magazin	e, do they typically know what firearm they are
3	see the	original AR-10 parts together as well.	3	purchasi	ing the magazine for?
4		MR. MAAG: Nothing further.	4	Α	No.
5		MR. WELLS: Switch, and I'll ask a few more.	5	Q	They don't know at all?
6		EXAMINATION	6	Α	We oftentimes I need a magazine as the only
7	QUEST	TONS BY MR. WELLS:	7	stateme	nt from the customer. We ask them more clarifying
8	Q	Mr. Pulaski, are any of these items that	8	question	ns, and their answers are usually for a certain
9	Mr. Maa	ag showed you laid out here on the table, are any of	9	caliber.	We have to work with them to find out what type
10	them yo	ours?	10	of gun t	that is for.
11	Α	No.	11	Q	But you engage in a follow-up conversation
12	Q	Are any of them property of Piasa Armory?	12	with you	ur customers; is that right?
13	Α	No.	13	Α	Yes.
14	Q	You were asked about a Beretta styled	14	Q	And based on that conversation, you can direct
15	magazi	ine. Do you see it in here?	15	them to	a particular product?
16		MR. MAAG: It's in your hand.	16	Α	Yes.
17	Q	(By Mr. Wells) Sorry. Got it. And you were	17	Q	And is that how things happen in the real
18	able to	tell just by looking at that magazine that it's	18	world at	Piasa Armory? People come in and see something
19	Beretta	1?	19	and the	n you have conversations about them and then you
20	Α	Of that style, but it's not a Beretta branded	20	direct th	em to a particular product that they are looking
21	magaz	ine.	21	for?	
22	Q	But it works in a Beretta pistol?	22	Α	Typically.
23	Α	I don't believe that it would.	23	Q	Do you own an M1 carbine?
24	Q	Why not?	24	Α	I do.
25	Α	That's a different brand.	25	Q	Is it a rifle or pistol?
		Page 158			Page 160
1	Q	What brand is it?	1	Α	Mine is a rifle.
2	Α	I believe it's Taurus.	2	Q	If you were to replace the magazine for that
3	Q	And you're able to tell that just from looking	3	M1 carb	oine, what round capacity would you purchase?
4	at it?		4	Α	Because it's a rifle, I would be required to
5	Α	Not from over there. No. I can't tell which	5	do a 10	-round magazine.
6	brand tl	hat is. But Taurus and Beretta make similar	6	Q	I think you were handed a 1911 frame. Do you
7	magaziı	nes, but they don't necessarily fit each other.	7	recall th	at?
8	Q	So a Taurus magazine wouldn't necessarily work	8	Α	Yes.
9	in a Ber	etta?	9	Q	And Mr. Maag had you attach the stock to the
10		Potentially, but it may not lock into the	10	1911. I	Do you recall that?
11	firearm	ı.	11	Α	Yes.
12	Q	And you see it has a 15 marking on that?	12	Q	And at that point you called it a rifle; is
13	Α	It does.	13	J	
14	Q	What does that mean?	14	Α	Yes.
15	Α	In the industry it typically means the	15	Q	, ,
16	capacit		16	Α	
17	Q	, , , ,	17		short-barreled rifle, presuming that's a complete
18		e capacity is for that firearm based on that	18	firearm	
19	marking		19	Q	'
20	A	, , , , ,	20		ers that are in front of you.
21	. Q	You were asked questions about if someone just	21	A	
22		you a magazine, you wouldn't necessarily be able to	22	, Q	, , ,
23		other it was for a rifle or pistol. Do you recall	23		nething you were able to determine what type of
24		Vaa	24		that the receiver would be suited for; is that
25	Α	Yes.	25	right?	



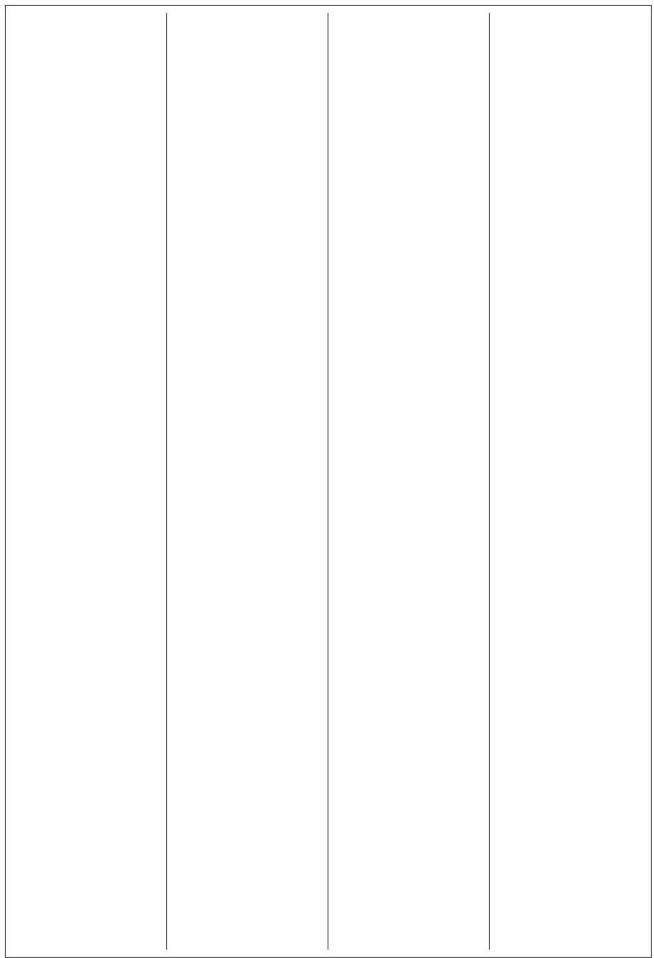
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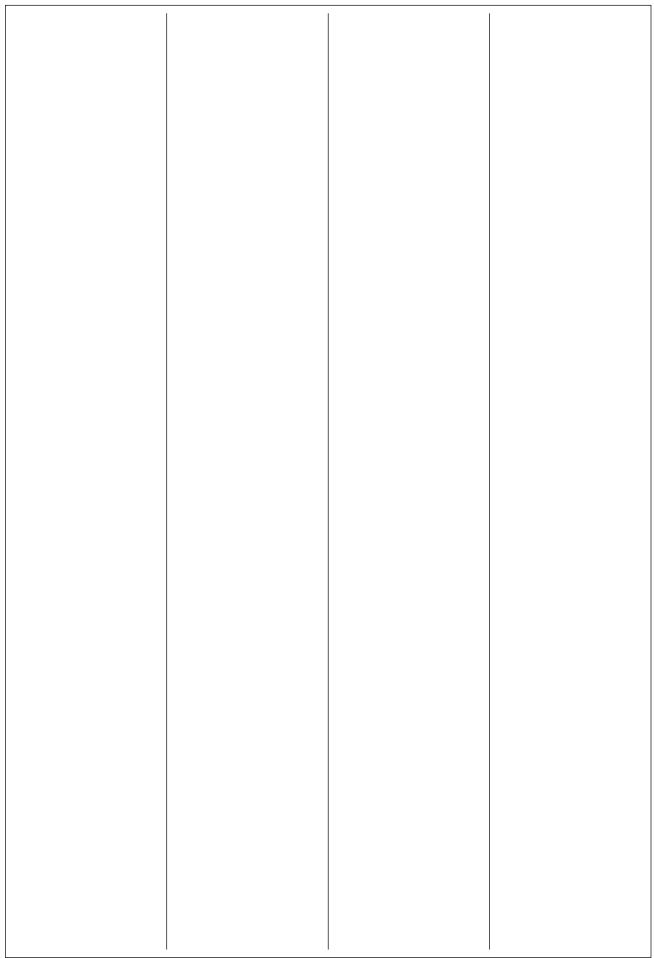
	,, ooz	Scott I	Pula	aski	age 12 // 2002
1	Α	Page 161 Potentially.	1	through :	Page 163 2022, that's 5,000?
2	Q	Is that a yes?	2	Α	Approximately.
3	Α	There's a variety of calibers that each	3	Q	You were asked about the Norinco 86S. Do you
4		r is suited for.	4	recall tha	at?
5	Q	So, for instance, you were asked about, I	5	Α	Yes.
6		a lower receiver that would accept Glock	6	Q	And the Norinco 86S looks like an AK?
7		nes; is that right?	7	Α	The receiver looks like an AK, but the rest of
8	_	Yes.	8	the firea	arm looks nothing like an AK.
9	Q	And you were able to identify just by looking	9	Q	You were asked about a receiver that had an M4
10		eceiver that it was likely to use Glock magazines;	10	marking	on it. Do you remember that?
11	is that r	•	11	Α	Yes.
12	Α	Yes.	12	Q	There's something called an M4 carbine; right?
13	Q	With no other information other than just	13	Α	There is.
14		at the receiver itself?	14	Q	And an M4 carbine is a carbine that's derived
15	_	Based on the shape of the magazine well and	15	from the	e M-16; right?
16		le that it's in.	16	Α	Yes.
17	_	You were asked about the M1 Garand and a gas	17	Q	And the M-16 is derived from the AR-15?
18		t system that it used?	18	Α	Yes.
19		Yes.	19	Q	So the M4 carbine In some instances, an M4
20	Q	The M1 Garand predates the AK-47 by a long	20	carbine	can be an AR-15 style rifle; right?
21	time; rig	,	21		M4 carbine is specifically marked on the
22	_	Yes.	22		. Colt, for example, uses that as a brand name or a
23	Q	You mentioned the Beretta AR-100. Do you	23		e name and their receivers are marked M4 carbine.
24	rememb	per that?	24	Q	And that's an AR-15 style rifle?
25	Α	I do.	25		It's a variant of the AR-15.
-		Page 162			Page 164
1	. Q	And you would agree that the AR-100 shares a	1		You were asked about the H&K MR 566. Do you
2		ape with AR-15 style rifles?		recall tha	
3	_	Basic outline.	3		Yes.
4	Q	So, yes, a basic outline?	4		And the 556 there refers to 556 caliber
5	_	Yes.		ammunit	
6	Q	You were asked about a broom handle	6	_	Typically.
7	A	Uh-huh (yes).	7	Q	And that 556 caliber ammunition is a common
8	Q	pistol, do you recall that?	8		mmunition for an AR-15?
9	_	I do.	9		It is.
10	Q	Do you own a broom handle pistol?	10		I think you were also asked about the Kel-Tec
11	Α	I do.	11		00 Gen2. Do you recall that?
12	Q	Prior to PICA taking effect, did you sell	12	_	I didn't. It's a generation, but yes.
13		nandle pistols at Piasa Armory?	13	Q	And is the Kel-Tec SUB2000 a pistol caliber
14		Occasionally, yes. I bought mine from our	14	carbine?	
15	compa		15		It is a the Kel-Tec refers to it as
16	_	How many have you sold?	16	•	* * *
17	Α	I believe we have had about six come through	17	_	What is a pistol caliber carbine?
18	_	e years.	18	Α	Usually pistol caliber carbines are rifle
19	Q	And that's since 2012 you sold six of that?	19		firearms, so 16-inch barrel or greater, that uses a
20	A	Yes.	20		nally pistol caliber round.
21	Q	How many AR-15s have you sold since 2012?	21		The Beretta CX4 Storm, is that also a pistol
22	Α	Many more than six.	22	caliber o	
23	Q	How many? Just give me your best estimate.	23	_	It is.
24	Α	Approximately 400 to 500 a year.	24	Q	I think you were handed a receiver as well and
25	Q	So since 2012, 500 times 10, just going	25	you wer	e asked about whether the receiver could be combined



_		Scott F	uia	SKI		D
1	with different parts to make it	Page 165 into an assault weapon as	1	Α	Yes.	Page 167
2	defined under PICA. Do you	recall that?	2	Q	You mentioned when you combined a lower	
3	A Yes.		3	receiver	and an upper receiver, one of which was from	ı
4	Q The receiver itself, in	n order for someone to	4	Palmetto	o, do you recall that?	
5	combine it with other parts to	bring it within the	5	Α	Yes.	
6	definition of PICA, that person	n would have to know about	6	Q	And they didn't exactly line up; is that	
7	the particular parts that they a	are assembling; right?	7	right?		
8	A The receiver itself	s a banned part, because	8	Α	Yes.	
9	it's a part that be used to as	semble an assault weapon.	9	Q	And if a person were to combine those, the	
10	Q Maybe I'm misreme	mbering what you were talking	10	lower re	eceiver and the upper receiver, you said it wou	ldn't
11	about earlier, but you were s	pecifically testifying about a	11	safely fu	unction; is that right?	
12	receiver that could be used f	or a pistol that would not be	12	Α	Correct.	
13	covered by PICA. Do you re	call that?	13	Q	What did you mean?	
14	A Right.		14	Α	The firearm may not function properly. It	
15	Q And that same rece	iver could also be used and	15	may I	Because there's an opening in the back, the	ey could
16	combined with other parts to	become a receiver for a rifle	16	have a	pinch or safety point that they could get ar	1
17	with certain features that wor	uld bring it into PICA; right?	17	extremi	ity into.	
18	A Potentially.		18		MR. WELLS: Subject to my prior objections,	I
19	Q So a person design	ing that, they would have to	19	don't ha	ave anything further at this time.	
20	know how to put the different	parts together; right?	20		MR. MAAG: You have the option to read this	
21	A They would.		21	transcrip	ipt looking for typographical errors. You canno	t
22	Q And they would have	re to specifically choose	22	change	an answer, except for correcting a typographi	cal
23	particular parts to combine w	ith that receiver?	23	error. Y	You don't have to read it. You can waive	
24	A Yes.		24	signatur	re. But it's up to you. I have no preference.	
25	Q And in the course of	f doing that, they would	25		THE WITNESS: What's the standard for su	ıch?
<u> </u>		Page 166				Page 168
	maka ahaisaa ahaut whathar t	a combine enecific nexts to	4		MD MAAC, Itle whetever the witness wents to	. ago 100
1	make choices about whether to	, ,	1		MR. MAAG: It's whatever the witness wants to	1 490 100
2	reach a certain desired firearm	, ,	2	do.		, ago 100
3	reach a certain desired firearm right?	, ,	2 <b>3</b>	do. -	THE WITNESS: I trust the court reporter.	1 ago 100
2 3 4	reach a certain desired firearm right?  A Yes.	at the end of the day;	2 <b>3</b> 4	do. - I	THE WITNESS: I trust the court reporter. MR. MAAG: So you waive?	1 ago 100
2 3 4 5	reach a certain desired firearm right?  A Yes.  Q You were showed a company of the company of th	at the end of the day;	2 3 4 5	do. - ! -	THE WITNESS: I trust the court reporter.  MR. MAAG: So you waive?  THE WITNESS: I'll waive.	r ago 100
2 3 4 5 6	reach a certain desired firearm right?  A Yes.  Q You were showed a described them as standard Al	at the end of the day;	2 3 4 5 6	do. - ! -	THE WITNESS: I trust the court reporter.  MR. MAAG: So you waive?  THE WITNESS: I'll waive.  MR. MAAG: Okay. Thank you.	r ago 100
2 3 4 5 6 7	reach a certain desired firearm right?  A Yes.  Q You were showed a described them as standard Althat?	at the end of the day;	2 3 4 5 6 7	do. - ! - !	THE WITNESS: I trust the court reporter.  MR. MAAG: So you waive?  THE WITNESS: I'll waive.  MR. MAAG: Okay. Thank you.  THE VIDEOGRAPHER: This ends the	·
2 3 4 5 6 7 8	reach a certain desired firearm right?  A Yes. Q You were showed a described them as standard Althat? A I don't recall that.	at the end of the day; couple of receivers and you R-15 lowers. Do you recall	2 3 4 5 6 7 8	do. - ! - ! video-red	THE WITNESS: I trust the court reporter.  MR. MAAG: So you waive?  THE WITNESS: I'll waive.  MR. MAAG: Okay. Thank you.  THE VIDEOGRAPHER: This ends the corded deposition of Scott Pulaski. We are going	·
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1	Page 169 CERTIFICATE OF REPORTER	
2		
3	I, Jamie Jo Kinder, CCR No. 842, CSR No.	
4	084.003306, do hereby certify that the witness whose	
5	testimony appears in the foregoing deposition was duly	
6 7	sworn by me; that the testimony of said witness was taken  by me to the best of my ability and thereafter reduced to	
8	typewriting under my direction; that I am neither counsel	
9	for, related to, nor employed by any of the parties to the	
10	action in which this deposition was taken, and further that	
11	I am not a relative or employee of any attorney or counsel	
12	employed by the parties thereto, nor financially or	
13	otherwise interested in the outcome of the action.	
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15	y of care	
16	Certified Shorthand Reporter	
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### IN THE CIRCUIT COURT CRAWFORD COUNTY, ILLINOIS

onne, N. J.	DEPOSITION EXHIBIT
PENGAD-Bayonne, M.	_

JEREMY W. LANGLEY,	)
TIMOTHY B. JONES and	)
MATTHEW WILSON,	)
v.	) Case No.
BRENDAN KELLY, in his official	)
capacity as Director of the Illinois	)
State Police, and COLE PRICE SHANER,	)
in his official capacity as States Attorney of	)
Crawford County, Illinois,	)
B 4-10-1	)
Defendants.	)

### AFFIDAVIT OF SCOTT PULASKI

Comes now Scott Pulaski, being first sworn, and under penalties of perjury, states as follows:

- 1. My name is Scott Pulaski. I am an owner of Piasa Armory, location in Alton, Illinois.
- 2. Piasa Armory is a Type 07 FFL, which is a firearm manufacturing and dealing license issued by the federal government. In addition, Piasa Armory holds a Class II Special Occupational Taxpayer endorsement, entitling it to manufacture most firearms regulated under the federal National Firearms Act. In addition, Piasa Armory is registered with the Illinois State police as a firearms dealer.
- 3. I am personally familiar with firearms, both historical and modern, as well as firearms regulations, both in Illinois and nationally, on account that ATF, the federally agency that licenses my business, makes me comply with all such laws, and provides me a publication listing the current ones.

WA

- In addition to being a firearms dealer, Piasa Armory and myself teach Illinois State Police certified concealed carry classes, both new and renewal.
- I am also familiar with what is popular for sale and purchase with Illinois residents and citizens.
- I am aware that this case was filed to challenge purported Public Act 102-1116, commonly called an gun and magazine ban.
- I am aware that the Public Act purports to ban general possession and most transfers of
  magazines that hold over 10 rounds, for rifles and shotguns, and over 15 rounds for
  pistols.
- 8. That there is no realistic way to determine that a given firearm magazines is for a pistol, or for a rifle, as many rifles and pistols use the exact same magazine. For instance, many Kel-Tec 9mm rifles use Glock or Beretta magazines, which are often used in Glock and Beretta pistols, respectively. Likewise, many pistols use magazines originally used in rifles. In fact, even as a "firearms expert", I cannot discern a "rifle magazine" from a "pistol magazine" simply by looking at it.
- 9. In addition, the Public Act purports to require owners to register their subject firearms. Almost no states have firearm registration, it previously existed only briefly in Illinois, about 50 years ago, and was repealed because nobody complied with it. In the pre-20<sup>th</sup> Century era, I am unaware of any regulation on firearms analogous to registration.
- 10. In addition, the Public Act purports to ban revolving shotguns. These have existed since at least 1855, when Colt manufactured such items before the Civil War. Taurus sells such a firearm, which is commonly sold throughout the United States.

- 11. In addition, the ban outlaws shotguns with either pistol grips or detachable magazines.
  These shotguns are very popular and commonly owned, both for sporting and defense purposes.
- 12. In addition, the ban outlaws pistols with threaded barrels, magazines outside of the grip, large pistols, and the like. Again, these pistols are commonly owned and popular for sports and defense. In fact, pistols like these are used in the Olympic target shooting competition.
- 13. In addition, the ban outlaws common semi automatic rifles, like the AR-15, the Springfield M1A, and actually even the standard SKS and M1 Garand.
- 14. Both the standard Soviet SKS, as well as Chinese, Yugoslavian and Romanian SKS rifles can be, and many have been, converted to detachable magazine, and have a barrel shroud that can be held by the non firing hand.
- 15. Likewise, the M1 Garand can be, and has been, converted to detachable magazine configuration, with John Garand himself making such conversions to accept BAR magazines, and the Italian companies Beretta and Breda both making them into detachable magazine BM59 rifles. The M1 also has a wood barrel shroud.
- 16. In fact, nearly any semi automatic, bolt action, or lever action rifle can be converted into a detachable magazine semi automatic. In fact, John Browning's first machinegun, was a conversion of a Winchester Model 1892 lever action rifle into a machinegun.
- 17. The ban also includes the Colt AR15, and various other listed firearms, by make and model, along with "copycats". Other than by make and model marking, it is impossible for anyone to discern, objectively, whether a firearm is such a copycat, and no guidance is provided as to how much difference is required. For instance, the Colt AR15 used a

different size threaded front take down pin hole than most similar firearms. Some have solid trigger groups, some do not. Some have threaded pin holes, some use coil pins. Some accept drop in trigger groups, some do not. There are at least two sizes of trigger parts that might arguably fit into such rifles. M1 Carbine trigger groups are mechanically similar to Colt AR15 groups. The copycat ban is so vague that not even experts can discern what is a copycat.

- 18. The simple fact of the matter is, the very semi automatic firearms listed in the ban, are the either the most popular firearms in the United States, with literally tens of millions sold in the past few years, or simply, such as is the case with the Beretta 93 listed, not even a semi-automatic, rather, it is a machinegun version of the common Beretta 92 pistol. Likewise, while cosmetically similar semi auto only models were made, with different model numbers, the AR10, as originally manufactured, is also a machinegun, as is and was the Beretta AR70, the Steyr AUG and the FN FAL. The entire ban is arbitrary and obviously written by people with no knowledge of firearms.
- 19. In addition, as to the ban on over 10 or over 15 round magazines, both are simply not in compliance with what is actually popular and on the market. Since the Glock 17 of 1980, over 15 round magazines for pistols are common and the most popular. Those with less than 15 rounds are generally historical and obsolete, with most, like the Walther P38, actually out of production.
- 20. As to rifle magazines, since 1941, when the U.S. Military adopted the M1 Carbine, fist 15 round, and later in 1944, 30 round magazines were standard. In 1957, with the adoption of the M14, in the U.S., and the FN FAL in most western nations, 20 round magazines were standard for those rifles, as well as their U.S. commercially sold versions. The M16

was designed in the late 1950s with a 20 round magazine, and sold commercially, in semi auto, in 1964 with a 20 round standard magazine. By the 1970s, 30 round magazines had become standard. Today, 28 to 35 round magazine are standard for self defense and target shooting rifles, for most semi automatic rifles sold in the U.S. today, nationwide, as well as the State of Illinois.

- 26. As to the .50 BMG, it is also a commonly owned firearm and ammunition. It is commonly used for long range target shooting, with the ammunition being sold on the market since at least the 1920s, and firearms commonly available since at least the 1980s. Many long range records are held by .50 BMG sporting rifles.
- 27. Rifles, with bore diameters of well over .50 inches have been commonly owned since will before the American Revolution. In fact, the standard British Brown Bess bore diameter during the American Revolution was .75 inches, of half again larger than the .50 BMG. .69 caliber firearms were commonly held and used after the Revolution by Americans, with .577 rifles standard from 1855 to about 1872.
- 28. That the ban has made it impossible for me, and other licensed dealers, to sell or transfer to Illinois residents, what has been the most popular firearms and magazines in Illinois and the U.S. previously.
- 29. In fact, due to various vague terms in the ban, many wholesalers are refusing to even ship replacement parts to Illinois addresses.
- 30. In this ban is allowed to stand, the average Illinoisan will be limited to firearms designed in the 1890s and earlier, instead of modern firearms.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except

Case 3:23-cv-00209-SPM Document 124-2 Filed 10/10/23 Page 80 of 256 Page ID #4000 \*

Case 3:23-cv-00192-SPM Document 6-1 Filed 01/24/23 Page 6 of 6 Page ID #147

as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Dated: (31/23/23)

Scott Pulaski

### IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS



CALEB BARNETT, et al.,	)		
Plaintiffs,	)		
vs.	)	Case No. 3:23-cv-209-SPM	
	)		
KWAME RAOUL, et al.,	)		
	)		
Defendants.	)		
DANE HARREL, et al.,	)		
	)		
Plaintiffs,	)		
	)		
vs.	)	Case No. 3:23-cv-141-SPM	
	)		
KWAME RAOUL, et al.,	)		
	)		
Defendants.	)		
JEREMY W. LANGLEY, et al.,	)		
	)		
Plaintiffs,	)		
	)	C N- 2-22 102 CDM	
vs.	)	Case No. 3:23-cv-192-SPM	
DDEND AN EZELLY -4 -1	)		
BRENDAN KELLY, et al.,	)		
Defendant	)		
Defendants.	)		



### STATEMENT PURSUATNT TO 28 USC 1746

- 1. My name is Scott Pulaski, I am over 21 years of age, under no legal disabilities, and make this sworn statement either under personal knowledge, or for historical matters, based upon my knowledge, training and education on the subject, including books relied on by others in the field that are accepted as authoritative.
- 2. I am an owner of a firearms store, licensed by both the State of Illinois, and the BATF, with a Type 07 Federal Firearms License and a Class II SOT, allowing me to deal in and manufacture firearms, including those regulated under the National Firearms Act. I have been in this business many years, and operate what is likely the largest such store in Madison County.
- 3. I have studied firearms most of my life.
- 4. I have also collected, shot and studied firearms for years before owning a firearms dealer.
- I have taught many firearms related classes, including teaching firearm self defense and concealed carry.
- 6. I am familiar with firearms generally, as well as the following models and kinds of firearms, as well as the magazines or other ammunition feeding devices they use:
  - A. Beretta M 9 Pistol, and
  - B. Beretta CX4 Storm rifle, and
  - C. Remington Model 870, including the DM variant and the Tac14 variant, and
  - D. The Soviet AK47,
  - E. The SKS rifle, including those with detachable magazines,
  - F. The Walther K43, also known as the G43,
  - G. The U.S. military issue M16 series,

- H. The Colt AR15 series
- I. The Check vz52 and vx58,
- J. The m1 Garand,
- K. The Beretta BM59,
- L. The Browning Model 1919 series, including semiautomatic copies,
- M. The Japanese Type 3 machinegun
- N. M1 and M2 carbine.
- O. the AR7
- P. the AR17 and
- Q. the AR24
- 7. I am also familiar with a brand of Vodka sold under the AK47 name, usually in a glass container more of less in the shape of an AK47 rifle.
- 8. That is it objectively impossible to determine whether a given magazine, feed strip, or other ammunition feeding device is for a rifle, shotgun, handgun or something else, simply by looking at the device.
- 9. For instance, the magazine for a Beretta M9 pistol is identical and interchangeable with that of the Beretta CX4 rifle. Likewise, many rifles use Glock pistol magazines, including the Kel-Tec, and Ruger sells rifles that use the same magazines as Glock pistol and Ruger pistols. A magazine that fits an AR15 or AK47 rifle will also fit a pistol of similar design, as well as firearms not classified as rifle, shotgun or pistol, such as the federal AOW category or other category.
- The Remington 870 DM shotgum uses the same magazine as the non-shoulder fired Remington 870 Tac 14 DM.

- U.S. M1 carbine magazines will fit rifle, pistol and other versions of said carbine interchangeably.
- 12. Other models of firearms I can think of off hand, which use magazines that can be and commonly are used in both rifles and pistols, as well as "other" firearms, are AK47 type magazines, AR15 type magazines, Luger magazines, 1911 magazines, Smith and Wesson 59 magazines, Ruger 10-22 magazines, Soviet PPS43 type magazines, Uzi type magazines, and Thompson model 1928 type magazines.
- 13. As to the named firearms in the Illinois ban, as I previously stated, I am familiar with both the AK, or Soviet Avotmat Kalahnikov series of rifles, which is a 1947 Soviet designed select fire shoulder fired weapon, that under federal law would be a machinegun. According to official Soviet propaganda, the firearm was designed by a wounded former Soviet army tank mechanic named Mikhail T. Kalashnikov. The firearm, and its actual derivatives, use an M1 Garand style gas and bolt system, a Remington Model 8 safety/selector, and are made from either machined or stamped steel components,
- 14. The SKS was designed by Sergey Gavrilovich Simonov, a Soviet weapons designer, and unlike the AK47 based designs, was actually designed in 1944, and first used in prototype form in the Ukraine by Belorussian troops in the Soviet Army also in 1944. The SKS operating system has nothing in common with the AK47, and instead, although some claim it to be a scaled down PTRS 14.5mm anti tank rifle, in fact it is a near complete copy of the Walther G43, aka K43 rifle of World War II, except the SKS usually comes with a fixed magazine, and in a 7.63x39mm Soviet Short chambering, as opposed to the 7.92x57mm Mauser chambering, and detachable magazine of the G43. An fixed

- magazine SKS can be made into a detachable magazine SKS by simply taking out the trigger group and magazine, and replacing only the trigger group.
- 15. The G43 itself, is a product improved Tokarev gas system, lifted from the SVT series of rifles used by the Soviet Union, in 7.62x54R caliber.
- 16. The SKS is not, under any circumstances, a copy, close, derivative or based on an AK of any kind.
- 17. Neither is the Check vz58 or the German StG44 rifles, which also use completely different operating systems than the AK47, and were designed independently of the AK47.
- 18. Based strictly on the terms of the statute, I am unable to discern what is meant by "all AK types". For instance, would this include a .22 rifle made to look like an AK47? If an SKS is treated as an AK type, despite obviously not being one, I am unsure whether an M1 Garand, or a Ruger Mini 30, would also be so classified, as they use the same bolt and operating system style, despite being completely different firearms
- 19. As back the ban, it also generally prohibits inter alia "all AR Type", and states this includes the AR15, the Armalite M15 .22LR Carbine, the Beretta AR70 and the Rock River Arms AR47.
- 20. An AR15 is a patented model number of a rifle only made by Colt, that uses a direct impingement gas system, copied out of a Swedish AG42 rifle, also used by the French M1949 series of rifle, including the M49/56, except that the AR15 uses a rotary bolt. The AR15 also uses magazines designed for it, sometimes called STANAG magazines, that have become industry standard in the caliber.

- 21. The Armalite M15 .22LR Carbine is designed to LOOK LIKE, an early prototype AR15, circa about 1964, by is in a different caliber, has no gas system, and completely different operating system, and uses different magazines.
- 22. The Beretta AR70 has nothing in common with the AR15, except caliber, and while the AR15 is made from machined aluminum, the AR70 is made from largely stamped steel.
  No parts between the two interchange.
- 23. There is no such gun as the Rock River Arms AR47, but if that is intended to refer to the LAR-47, again, there are substantial differences, including caliber, magazine used and the general appearance.
- 24. In sum, there is no objective way that a person can determine whether or not a given magazine is a "handgun" magazine or a "rifle" magazine under the Act, as they are identical.
- 25. There is no objective way that a person can determine that any ammunition feeding device is for a rifle, shotgun, pistol or other firearm, without knowing its design history, possibly going back well over a century, and without knowing about every single firearm ever made that might use that assumption feeding device.
- 26. Likewise, there are no objective standards to determine whether a given firearm is an AK type, an AR type, or something else. In fact, even the listed examples are often times not within the parameters of what even most firearms experts would consider to be an AK type, like the SKS, of an AR type.
- 27. That I have read the Plaintiff's Motion for Partial Summary Judgment as to Counts IV and VI, and to the best of my knowledge, the facts set forth in this sworn statement, and

in that motion, are true and correct. The photographs depicted show what they are labeled as correctly, and the descriptions contained in the motion are accurate.

- 28. If I were to testify in open court, I would testify consistently with this affidavit.
- 29. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 05/18/23

Scott Pulaski

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### State Laws and Published Ordinances - Illinois

Current through P.A. 102-557 and 102-662of the 2021 Session of the 102<sup>nd</sup> General Assembly.

Office of the Attorney General

100 West Randolph Street Chicago, IL 60601

Voice: (312) 814-3000 http://www.illinoisattorneygeneral.gov/



Chicago Field Division 175 West Jackson Blvd., Suite

1500Chicago, IL 60604 **Voice:** (312) 846-7200

https://www.atf.gov/chicagofield-division



### **Table of Contents**

### Chapter 430 – Public Safety Firearm Owners Identification Card Act

Section 430 ILCS 65/1.1. Firearm defined; Firearm ammunition defined.

Section 430 ILCS 65/1.1. Firearm defined; Firearm ammunition defined.

Section 430 ILCS 65/2. Firearm Owner's Identification Card required; exceptions.

Section 430 ILCS 65/3. Transfer of firearms; records; exceptions.

Section 430 ILCS 65/3a. Reciprocal rights in Iowa, Missouri, Indiana, Wisconsin and Kentucky.

Section 430 ILCS 65/3.1 Firearm Transfer Inquiry Program.

Section 430 ILCS 65/3.1. Dial up system.

Section 430 ILCS 65/3.2. List of prohibited projectiles; notice to dealers.

Section 430 ILCS 65/4. Application for Firearm Owner's Identification Cards.

Section 430 ILCS 65/4. Application for Firearm Owner's Identification Cards.

Section 430 ILCS 65/5. Approval and renewal

Section 430 ILCS 65/5. Approval and renewal

Section 430 ILCS 65/6. Contents of Firearm Owner's Identification Card.

Section 430 ILCS 65/6. Contents of Firearm Owner's Identification Card.

Section 430 ILCS 65/7. Validity of Firearm Owner's Identification Card.

Section 430 ILCS 65/7.5 Email and Text Message Notifications

Section 430 ILCS 65/8. Grounds for denial and revocation.

Section 430 ILCS 65/8.1. Notifications to the Department of State Police.

Section 430 ILCS 65/8.2. Firearm Owner's Identification Card denial, suspension, or revocation.

Section 430 ILCS 65/8.2. Firearm Owner's Identification Card denial or revocation.

Section 430 ILCS 65/8.3. Suspension of Firearm Owner's Identification Card.

Section 430 ILCS 65/8.3. Suspension of Firearm Owner's Identification Card.

Section 430 ILCS 65/8.4 Cancellation of Firearm Owner's Identification Card

Section 430 ILCS 65/8.5 Illinois State Police to Monitor Databases for Firearms Prohibitors

Section 430 ILCS 65/9. Grounds for denial or revocation.

Section 430 ILCS 65/9.5. Revocation of Firearm Owner's Identification Card.

Section 430 ILCS 65/9.5. Revocation of Firearm Owner's Identification Card.

Section 430 ILCS 65/10. Appeal to Director; Hearing; Relief from firearm prohibitions.

Section 430 ILCS 65/11. Judicial review of final administrative decisions.

Section 430 ILCS 65/12. Transfer of firearms upon death of owner or incident to legal proceedings.

Section 430 ILCS 65/13. Acquisition or possession otherwise prohibited.

Section 430 JLCS 65/13.1. Preemption.

Section 430 IL.CS 65/13.2. Renewal; name, photograph, or address change; replacement card.

Section 430 ILCS 65/13.2. Renewal; name or address change; replacement card.

### **Firearm Concealed Carry Act**

Section 430 ILCS 66/10.5 Electronic Concealed Carry Licenses

Section 430 ILCS 66/85. Background checks for sales.

### Firearms Restraining Order Act

Section 430 ILCS 67/5. Definitions. [Effective until June 1, 2022]

Section 430 ILCS 67/5. Definitions. [Effective June 1, 2022]

Section 430 LCS 67/10. Commencement of action; procedure. [Effective until June 1, 2022]



Section 430 ILCS 67/10. Commencement of action; procedure. [Effective June 1, 2022]

Section 430 ILCS 67/15. Subject matter jurisdiction.

Section 430 ILCS 67/20. Jurisdiction over persons.

Section 430 ILCS 67/25. Process.

Section 430 ILCS 67/30. Service of notice of hearings.

Section 430 ILCS 67/35. Ex Parte orders and emergency hearings.

Section 430 ILCS 67/35 Ex parte orders and emergency hearings. [Effective until June 1, 2022]

Section 430 ILCS 67/35 Ex parte orders and emergency hearings. [Effective June 1, 2022]

Section 430 ILCS 67/40. Six month orders.

Section430 ILCS 67/40 Six-month orders. [Effective until June 1, 2022]

Section430 ILCS 67/40 Six-month orders. [Effective June 1, 2022]

Section 430 ILCS 67/45. Termination and renewal. [Effective June 1, 2022]

Section 430 ILCS 67/45 Termination and renewal. [Effective June 1, 2022]

Section 430 ILCS 67/50. Notice of orders.

Section 430 ILCS 67/55. Data maintenance by law enforcement agencies.

Section 430 ILCS 67/60. Filing of a firearms restraining order issued by another state.

Section 430 ILCS 67/65. Enforcement; sanctions for violation of order.

Section 430 ILCS 67/70. Non-Preclusion of remedies.

Section 430 ILCS 67/80. Expungement or sealing of order.

Cover Page Only Due to Length

DEPOSITION EXHIBIT

U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives

Enforcement Programs and Services

# ATF Federal Firearms Regulations Reference Guide

2014



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LASER ENGRAVING

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618 433-2715

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### U.S. Department of Justice

Bureau of Alcohol, Tobacco, Firearms and Explosives Office of Enforcement Programs and Services Office of Field Operations

Washington, DC 20226 www.atf.gov

March 22, 2022

### OPEN LETTER TO ALL FEDERAL FIREARMS LICENSEES

The Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) recently examined devices commonly known as "forced reset triggers" (FRTs) and has determined that some of them are "firearms" and "machineguns" as defined in the National Firearms Act (NFA), and "machineguns" as defined in the Gun Control Act (GCA).

These particular FRTs are being marketed as replacement triggers for AR-type firearms. Unlike traditional triggers and binary triggers (sometimes referred to generally as "FRTs"), the subject FRTs do not require shooters to pull and then subsequently release the trigger to fire a second shot. Instead, these FRTs utilize the firing cycle to eliminate the need for the shooter to release the trigger before a second shot is fired. By contrast, some after-market triggers have similar components but also incorporate a disconnector or similar feature to ensure that the trigger must be released before a second shot may be fired and may not be machineguns.

Both the NFA and GCA regulate machineguns. "Machinegun" is defined under 26 U.S.C. § 5845(b) and 18 U.S.C. § 921(a)(23) as—

Any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person. (Emphasis added.)

ATF's examination found that some FRT devices allow a firearm to automatically expel more than one shot with a single, continuous pull of the trigger. For this reason, ATF has concluded that FRTs that function in this way are a combination of parts designed and intended for use in converting a weapon into a machinegun, and hence, ATF has classified these devices as a "machinegun" as defined by the NFA and GCA.

Accordingly, ATF's position is that any FRT that allows a firearm to automatically expel more than one shot with a single, continuous pull of the trigger is a "machinegun", and is accordingly subject to the GCA prohibitions regarding the possession, transfer, and transport of machineguns

### OPEN LETTER TO ALL FEDERAL FIREARMS LICENSEES (cont.)

under 18 U.S.C. §§ 922(o) and 922(a)(4). They are also subject to registration, transfer, taxation, and possession restrictions under the NFA. See 26 U.S.C. §§ 5841, 5861; 27 CFR 479.101.

Under 26 U.S.C. § 5871, any person who violates or fails to comply with the provisions of the NFA may be fined up to \$10,000 per violation and is subject to imprisonment for a term of up to ten years. Further, pursuant to 26 U.S.C. § 5872, any machinegun possessed or transferred in violation of the NFA is subject to seizure and forfeiture. Under 18 U.S.C. § 924(a)(2), any person who violates § 922(o) may be sent to prison for up to 10 years and fined up to \$250,000 per person or \$500,000 per organization.

Based on ATF's determination that the FRTs that function as described above are "machineguns" under the NFA and GCA, ATF intends to take appropriate remedial action with respect to sellers and possessors of these devices. Current possessors of these devices are encouraged to contact ATF for further guidance on how they may divest possession. If you are uncertain whether the device you possess is a machinegun as defined by the GCA and NFA, please contact your local ATF Field Office. You may consult the local ATF Office's webpage for office contact information.

Assistant Director

**Enforcement Programs and Services** 

GEORGE LAUDER Digitally signed by GEORGE LAUDER Date: 2022.03.22 13:25:39 -04'00'

Assistant Director Field Operations

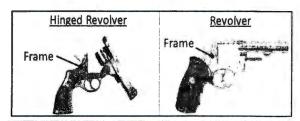
## DEPOSITION EXHIBIT

### § 478.12 Definition of Frame or Receiver.

- a. Except as otherwise provided in this section, the term "frame or receiver" means the following—
  - 1. The term "frame" means the part of a handgun, or variants thereof, that provides housing or a structure for the component (i.e., sear or equivalent) designed to hold back the hammer, striker, bolt, or similar primary energized component prior to initiation of the firing sequence, even if pins or other attachments are required to connect such component (i.e., sear or equivalent) to the housing or structure.
  - 2. The term "receiver" means the part of a rifle, shotgun, or projectile weapon other than a handgun, or variants thereof, that provides housing or a structure for the primary component designed to block or seal the breech prior to initiation of the firing sequence (i.e., bolt, breechblock, or equivalent), even if pins or other attachments are required to connect such component to the housing or structure.
  - 3. The terms "variant" and "variants thereof" mean a weapon utilizing a similar frame or receiver design irrespective of new or different model designations or configurations, characteristics, features, components, accessories, or attachments. For example, an AK-type firearm with a short stock (i.e., pistol grip) is a pistol variant of an AK-type rifle, an AR-type firearm with a short stock (i.e., pistol grip) is a pistol variant of an AR-type rifle, and a revolving cylinder shotgun is a shotgun variant of a revolver.
  - 4. The following are nonexclusive examples that illustrate the above definitions:
    - i. Hinged or single framed revolvers:

      The frame is the part of the revolver that provides a structure designed to hold the sear.

Figure 1 to paragraph (a)(4)(i)



ii. Colt 1911, Beretta/Browning/FN Herstal/Heckler & Koch/Ruger/Sig Sauer/Smith & Wesson/Taurus hammer-fired semiautomatic pistols:

The frame is the lower portion of the pistol, or grip, that provides housing for the sear.

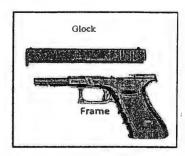
Figure 2 to paragraph (a)(4)(ii)



iii. Glock variant striker-fired semiautomatic pistols:

The frame is the lower portion of the pistol, or grip, that provides housing for the sear.

Figure 3 to paragraph (a)(4)(iii)



### iv. Sig Sauer P250/P320 variant semiautomatic pistols:

The frame is the internal removable chassis of the pistol that provides housing for the sear or equivalent component.

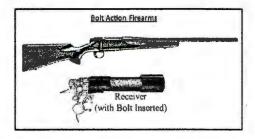
Figure 4 to paragraph (a)(4)(iv)



### v. Boit action rifles:

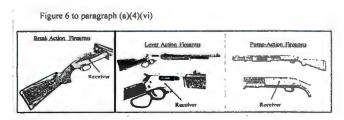
The receiver is the part of the rifle that provides a structure for the bolt.

Figure 5 to paragraph (a)(4)(v)



### vi. Break action, lever action, or pump action rifles and shotguns:

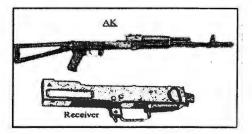
The receiver is the part of the rifle or shotgun that provides housing for the bolt, breechblock, or equivalent.



### vii. AK variant firearms:

The receiver is the part of the weapon that provides housing for the bolt.

Figure 7 to paragraph (a)(4)(vii)



### viii. Steyr AUG variant firearms:

The receiver is the central part of the weapon that provides housing for the bolt.

Figure 8 to paragraph (a)(4)(viii)



ix. Thompson machineguns and semiautomatic variants, and L1A1, FN FAL, FN FNC, MP38, MP40, and SIG 550 firearms, and HK machineguns and semiautomatic variants:

The receiver is the upper part of the weapon that provides housing for the bolt.

Figure 9 to paragraph (a)(4)(ix)



x. Sten, Sterling, and Kel-Tec SUB-2000 firearms:

The receiver is the central part of the weapon, or tube, that provides housing for the bolt.

### b. Firearm muffler or silencer frame or receiver.

The terms "frame" and "receiver" shall mean, in the case of a firearm muffler or firearm silencer, the part of the firearm, such as an outer tube or modular piece, that provides housing or a structure for the primary internal component designed to reduce the sound of a projectile (i.e., baffles, baffling material, expansion chamber, or equivalent). In the case of a modular firearm muffler or firearm silencer device with more than one such part, the terms shall mean the principal housing attached to the weapon that expels a projectile, even if an adapter or other attachments are required to connect the part to the weapon. The terms shall not include a removable end cap of an outer tube or modular piece.

### c. Partially complete, disassembled, or nonfunctional frame or receiver.

The terms "frame" and "receiver" shall include a partially complete, disassembled, or nonfunctional frame or receiver, including a frame or receiver parts kit, that is designed to or may readily be completed, assembled, restored, or otherwise converted to function as a frame or receiver, i.e., to house or provide a structure for the primary energized component of a handgun, breech blocking or sealing component of a projectile weapon other than a handgun, or internal sound reduction component of a firearm muffler or firearm silencer, as the case may be. The terms shall not include a forging, casting, printing, extrusion, unmachined body, or similar article that has not yet reached a stage of manufacture where it is clearly identifiable as an unfinished component part of a weapon (e.g., unformed block of metal, liquid polymer, or other raw material). When issuing a classification, the Director may consider any associated templates, jigs, molds, equipment, tools, instructions, guides, or marketing materials that are sold, distributed, or possessed with the item or kit, or otherwise made available by the seller or distributor of the item or kit to the purchaser or recipient of the item or kit. The following are nonexclusive examples that illustrate the definitions:

### **EXAMPLE 1 TO PARAGRAPH (C)-FRAME OR RECEIVER:**

A frame or receiver parts kit containing a partially complete or disassembled billet or blank of a frame or receiver that is sold, distributed, or possessed with a compatible jig or template is a frame or receiver, as a person with online instructions and common hand tools may readily complete or assemble the frame or receiver parts to function as a frame or receiver.

### EXAMPLE 2 TO PARAGRAPH (C)-FRAME OR RECEIVER:

A partially complete billet or blank of a frame or receiver with one or more template holes drilled or indexed in the correct location is a frame or receiver, as a person with common hand tools may readily complete the billet or blank to function as a frame or receiver.

#### EXAMPLE 3 TO PARAGRAPH (C)-FRAME OR RECEIVER:

A complete frame or receiver of a weapon that has been disassembled, damaged, split, or cut into pieces, but not destroyed in accordance with paragraph (e), is a frame or receiver.

### **EXAMPLE 4 TO PARAGRAPH (C)-NOT A RECEIVER:**

A billet or blank of an AR-15 variant receiver without critical interior areas having been indexed, machined, or formed that is not sold, distributed, or possessed with instructions, jigs, templates, equipment, or tools such that it may readily be completed is not a receiver.

### **EXAMPLE 5 TO PARAGRAPH (C)-NOT A RECEIVER:**

A flat blank of an AK variant receiver without laser cuts or indexing that is not sold, distributed, or possessed with instructions, jigs, templates, equipment, or tools is not a receiver, as a person cannot readily fold the flat to provide housing or a structure for the primary component designed to block or seal the breech prior to initiation of the firing sequence.

### d. Multi-piece frame or receiver.

The term "multi-piece frame or receiver" shall mean a frame or receiver that may be disassembled into multiple modular subparts, i.e., standardized units that may be replaced or exchanged. The term shall not include the internal frame of a pistol that is a complete removable chassis that provides housing for the energized component, unless the chassis itself may be disassembled. The modular subpart(s) identified in accordance with § 478.92 with an importer's or manufacturer's serial number shall be presumed, absent an official determination by the Director or other reliable evidence to the contrary, to be part of the frame or receiver of a weapon or device.

### e. Destroyed frame or receiver.

The terms "frame" and "receiver" shall not include a frame or receiver that is destroyed. For purposes of these definitions, the term "destroyed" means that the frame or receiver has been permanently altered such that it may not readily be completed, assembled, restored, or otherwise converted to function as a frame or receiver. Acceptable methods of destruction include completely melting, crushing, or shredding the frame or receiver, or other method approved by the Director.

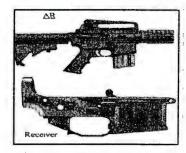
## 1. FRAME OR RECEIVER CLASSIFICATIONS BASED ON WHICH PART OF THE WEAPON WAS CLASSIFIED AS SUCH BEFORE APRIL 26, 2022.

Except as provided in paragraph (f)(2) of this section, the terms "frame" and "receiver" shall include the specific part of a complete weapon, including variants thereof, determined (classified) by the Director to be defined as a firearm frame or receiver prior to April 26, 2022. Any such part that is identified with an importer's or manufacturer's serial number shall be presumed, absent an official determination by the Director or other reliable evidence to the contrary, to be the frame or receiver of the weapon. The following is a nonexclusive list of such weapons and the specific part determined by the Director to be the firearm frame or receiver as they existed on that date:

### i. AR-15/M-16 variant firearms:

The receiver is the lower part of the weapon that provides housing for the trigger mechanism and hammer (i.e., lower receiver).

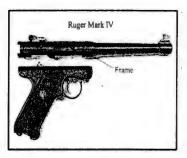
Figure 11 to paragraph (f)(1)(i)



### ii. Ruger Mark IV pistol:

The frame is the upper part of the weapon that provides housing for the bolt or breechblock.

Figure 12 to paragraph (f)(1)(ii)



### iii. Benelli 121 M1 Shotgun:

The receiver is the lower part of the weapon that provides housing for the trigger mechanism.

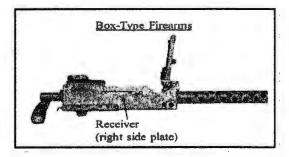
Figure 13 to paragraph (f)(1)(iii)



iv. Vickers/Maxim, Browning 1919, M2, and box-type machineguns and semiautomatic variants:

The receiver is the side plate of the weapon that is designed to hold the charging handle.

Figure 14 to paragraph (f)(1)(iv)



2. FRAME OR RECEIVER CLASSIFICATIONS OF PARTIALLY COMPLETE, DISASSEMBLED, OR NONFUNCTIONAL FRAMES OR RECEIVERS BEFORE APRIL 26, 2022.

Prior determinations by the Director that a partially complete, disassembled, or nonfunctional frame or receiver, including a parts kit, was not, or did not include, a "firearm frame or receiver" under § 478.11, or "frame or receiver" under § 479.11 of this subchapter, as those terms were defined prior to April 26, 2022, shall not continue to be valid or authoritative after that date. Such determinations shall include those in which the Director determined that the item or parts kit had not yet reached a stage of manufacture to be, or include, a "firearm frame or receiver" under § 478.11, or "frame or receiver" under § 479.11 of this subchapter, as those terms were defined prior to April 26, 2022.

Case 3:23 cv 00200 CPM Decument 124 2 Filed 10/10/23 Page 109 of 256 F

# Shooters and EDITION BILDER GUIDE TO ARABAR-15s

A Comprehensive Guide to Modern Sporting Rifles and Their Variants



Details of the newest

guns and options

and Robb Manning

Foreword by Tiger McKee

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# **CONTENTS**

INTRODUCTION	9
CHAPTER 1 HISTORY	14
CHAPTER 2 BREAKING DOWN THE AR	20
CHAPTER 3 NEW RIFLES	30
CHAPTER 4 AR RIFLE MODELS	51
CHAPTER 5 D-I-Y RIFLES	176
CHAPTER 6 OUTFITTING YOUR RIG	185
CHAPTER 7 THE SPORTING AR	203
CHAPTER 8 AR RIFLES: ULTIMATE HOME DEFENSE	211
CHAPTER 9 WHAT THE FUTURE HOLDS	219
APPENDICES	t
APPENDIX I AR MANUFACTURERS	225
APPENDIX II AMMUNITION MANUFACTURERS	227
APPENDIX III OPTICS AND SIGHTS MANUFACTURERS	228
APPENDIX IV AR ACCESSORIES AND SUPPLIERS	229
<b>ACKNOWLEDGMENTS</b>	230

# 1. History of the AR

or all of its popularity among the military, law enforcement and civilian shooters today, the AR-15 almost never happened. Or at the very least, its development was almost grounded

before it really got the chance to fly. Dissatisfied with the overall performance of the M14 rifle that was in service at the time, the Army in the 1950s sought the assistance of commercial gun manufacturers in developing a .22-caliber firearm capable of replacing it in combat.

As the military had crossed the bridge from a post-World War II era, the focus of many of the branches was on devising tactics, equipment and machinery capable of countering the nuclear capabilities of our new age Cold War enemies. Partially responsible for this task within the U.S. Army was the Operations Research Office, created after World War II. However, the ORO increasingly found itself attempting to solve non-nuclear related challenges prompted by our country's engagement in North Korea. One such concern, recounted in the late Edward C. Ezell's book, The Great Rifle Controversy, one of the most detailed and comprehensive examinations of military small arms development in the United States between the close of World War II and the early 1980s, was that "ORO investigators discovered that very little was known about the nature of inflicting wounds on the human body in combat."

As a result, the Infantry Division of ORO began to study the issue by analyzing more than 3 million casu-

alties from World Wars I and II, as well as those that had occurred in Korea up to that point. For the first time, an analysis suggested that more soldiers were killed by randomly dispersed fire than carefully aimed shots, suggesting that a light-recoiling rifle that could rapidly launch multiple projectiles in a controlled, yet simultaneously spread pattern, could ultimately be more effective on the battlefield.

Following several years of studying the idea, the Continental Army Command (CONARC) decided to seek the development of a 5.56mm rifle. They reached out to both Winchester, owned by Olin, which now only manufactures the ammunition under that brand, and the ArmaLite Division of Fairchild Engine & Airplane Corp., which today is simply known as ArmaLite Inc. (But ironically no longer owns the trademark for the actual AR-15 name. More on that in a moment.)

#### ARMALITE'S NEW CONCEPT RIFLE

According to a history of ArmaLite, Inc., recognizing that there had been little done in the way of advancing fundamental small arms design and function in the past 50 years, Fairchild executives president Richard S. Boutelle, a gun enthusiast, and Paul S. Cleveland, corporate secretary, wanted to focus on developing fine sporting arms for the commercial market with the hope that their work would catch the eyes of military leaders and provoke some interest. However, shortly after establishing the ArmaLite Division, the company was





 ☐ Today's M4, an AR variant, is the top choice among many of our nation's military. Photo Credit: DoD Photos

Invited by the U.S. Air Force to submit a rifle design that would replace the branch's survival rifle. Within a matter of weeks, ArmaLite submitted a rifle dubbed the AR-5 to the Air Force for evaluation. The rifle was built around the .22 Hornet. The Air Force adopted the rifle, which was officially designated the MA-1 Survival Rifle. This success forced the company to rethink its original decision to pursue the commercial market and instead, they changed course and focused exclusively on developing arms for the military.

From there, three people involved with ArmaLite came together to alter the course of modern firearms as we know them. According to ArmaLite, it was the idea of George Sullivan, a chief patent counsel for Lockheed Aircraft Corporation, to use the "latest technical advances in plastics and alloys" to build firearms that were lighter and more functional than then-available models. In fact, Sullivan, a tinkerer himself, had begun work on some of his ideas in his garage following World War II. Charles Dorchester directed and coordinated all of ArmaLite Division's development programs and would later go on to run the entire company. But perhaps most recognizable of the three whom would go on to change history and the one historical scholars credit for the birth of the AR platform was Eugene Stoner. Stoner, who had served as a Marine during the war and was considered an ordnance expert, was made chief engineer of the ArmaLite Division in 1954. He had been working on developing small arms independently since the war as well. It is Stoner's patents that "form the basis of much of ArmaLite's work," according to the company's historical records.

In 1955, the Army was looking to update or replace the service rifle of the time, the M1 Garand, and were considering two versions: Springfield Armory's T-44, merely an updated version of the Garand, and

the T-48, a version of the 7.62x51mm FN FAL, which was developed and manufactured by Fabrique Nationale de Herstal, known today primarily as FN Herstal. The FAL would ultimately go on to be adopted by as the primary service rifle used by many NATO coun-

○ Eugene Stoner, creator of the AR design.

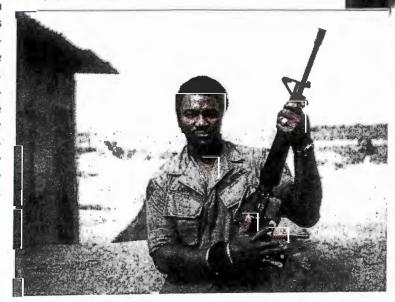
tries including Belgium, Great Britain, Canada and Australia.

To compete with these firearms, Stoner took a totally new approach in firearms design of the day and created the AR-10. The first version of the AR-10 was made with aircraft grade aluminum receivers, keeping the weight down considerably from what it looked like it might weigh. In fact, empty, the rifle weighed less than 7 pounds. The receivers could be made from such lightweight material because the bolt locked into a steel extension that attached to the barrel, not directly in the receiver itself. Stocks, pistol grips and fore-ends were all plastic compared to the wood-grain furniture more common to guns of the day. Unfortunately, despite capturing the attention of more than a few military leaders intrigued by the firearm's unique design, the ArmaLite Division had gotten involved too late to adequately compete. An article that first appeared in the May 1962 issue of American Rifleman magazine noted that the initial AR-10 had also fallen prey to flaws with its original composite steel-aluminum barrel and a complicated flash suppressor.

According to Ezell, however, of those leaders intrigued by the AR-10's design included CONARC's commander, Gen. Willard G. Wyman. In 1957, Wyman personally asked Stoner to design a 5.56mm rifle for the Army similar to the AR-10. That scaled-down rifle would go on to become the AR-15.

The first AR-15s had steel barrels and an Armydeveloped BAR-type flash suppressor. And while Stoner's design has been called genius by many, the real genius may have been found in the engineer's ability to borrow features from a number of popular and proven European gun designs and combine them

➢ In the form of the M16, the AR made its way into the hands of our mintary by 1963. Photo Credit: DoD Photos



in a single platform. The now-ubiquitous hinge design of the AR, not unlike that of a break-open shotgun, was similar to a design used in the Czech ZH or ZB 29 rifle and adopted in the FN. The rear sight was built into the rear of the carrying handle like the British EM 2, the hinged cover on the ejection port resembled that of the German Sturmgewehr 44, the locking system was similar to the one used in the Johns Semiautomatic Rifle from the 1940s and the straight stock, designed to better accommodate recoil and manage multiple shots, was similar to a number of auto and semi-auto rifle designs getting some play at the time, including as Ezell pointed out, the Harvey T25.

Stoner's gas operating system, which employed, and still does on direct impingement ARs, a tube beneath the front sight and directed gas back to the bolt in order to cycle rounds during firing, had been used in the both Swedish M42 Ljungman and the French MAS 1949.

"Stoner's achievement in the AR-15 was the combination of all of these ideas into an attractive package," wrote Ezell. Of course, once designed, the rifle still had to win favor with the military, a battle that almost ended the AR-15's prominent role in history right there.

To begin, ArmaLite was so small, it didn't have a full research facility or the staff to completely develop a fully tested prototype. Instead, they had to rely on military testers, many whom had their own prejudices against this new weapon and did it few favors to discover if it could actually serve soldiers well. There were some key leaders in the Army who simply didn't like the fact that the new gun hadn't been developed within the branch's own usual channels. Others simply didn't like the new configuration of the gun, much as some traditional-minded hunters view the firearm even today. Rain tests conducted on a test sample of the rifles originally suggested that shooting the guns with water in the barrels could result in burst barrelssomething that was believed at the time to be "characteristic of high-velocity rifles having a bore diameter of less than .25 caliber," according to Ezell. ArmaLite strengthened the barrels in response, but still concerns over the hazard persisted. Arctic tests conducted on the rifles to determine how they would perform in freezing weather also proved disappointing to testers, though the Winchester .224 rifle still being considered

at the time also failed in this respect. In the end, the test board reviewing the new rifles suggested that a ".223 (5.56mm) round was not a suitable replacement for the 7.62 NATO round" and that development of a heavier .258 caliber (6.35mm) cartridge be pursued (Ezell). In light of the recommendations, Army Chief of Staff Gen. Maxwell Taylor ruled the branch would continue procuring the heavier and already NATO approved 7.62 M14 rifles.

#### SECOND CHANCE

After all of the expense in developing the AR-15, it was a tough financial blow to a small company like Fairchild, which, struggling to make ends meet, had actually already begun to search for a company to which to license the production of both the AR-15 and the AR-10. The company had invested in the AR-15 project alone \$1.45 million, an amount that by today's corporate standards would be fairly cheap but for any small company, then or now, could be a backbreaker. Fairchild decided to recoup some of the costs of the protracted project by selling the manufacturing and marketing rights to what was then called Colt's Patent Firearms Manufacturing Company, but is better known today simply as Colt's Manufacturing, LLC, or merely Colt. The company bought the rights to both firearms (a version of the AR-10 had already been sold to the Dutch and was being marketed in Southeast Asia where conflicts were erupting in what was then a little-known country called Vietnam) for \$75,000 cash payment and a guarantee of a 4 1/2 percent royalty on all future sales.

In The Black Rifle: M16 Retrospective by R. Blake Stevens and Edward C. Ezell, the authors note that at the time, Colt was also suffering financially as a result of dried up military and civilian markets following WWII. The company also hadn't retooled its manufacturing facilities in nearly a century. The Maryland-based firm of Cooper-MacDonald, which through one of its principles, Robert W. "Bobby" MacDonald already promoted the Dutch AR in Southeast Asia, worked with both ArmaLite and Colt and had been the connection that brought the sale of the ARs together. Interestingly, Cooper-MacDonald made more off the sale of the guns to Colt than



☆ The first true military version of the AR-15, the M16, got its first full trial during the Vietnam War. Photo Credit: DoD Photos

Fairchild, netting \$250,000 and a 1 percent royalty on all future guns sold.

MacDonald, who had extensive contacts in Southeast Asia and saw the AR-15 as an ideal gun for the "smaller statured" fighters of the region, immediately began marketing the gun in that part of the world and, under orders from Colt, to the U.S. military once again. They wanted to see the AR-15 given another chance.

Initially Army representatives refused. But Colt had better luck when they decided to bypass the branch and seek other military buyers. Ultimately, Air Force Vice Chief of Staff Gen. Curtis LeMay, who witnessed a demonstration of the guns, suggested that the Air Force test the AR-15 as a replacement for the M2 carbines used by its sentries. The tests proved positive and the Air Force placed an initial order for 8,500 rifles (Ezell). Sometimes it just takes that one lucky break to get the door to open wider than your foot and allow you to walk on through.

Studies by the Defense Department, who agreed to give the gun another look, also proved favorable, causing questions to be asked all the way up the chain of command as to why the disparity between the Army's original findings and the reports coming out about the gun then. Indeed, both Secretary of Defense Robert McNamara and even then President John F. Kennedy had questions. Ultimately, the Army was forced to reevaluate the rifle the result being in 1963 that the

decision was made to end procurement of the M14. At the same time, McNamara ordered the purchase of 85,000 AR-15s for the Army and 19,000 for the Air Force, who was already using some of the guns, to begin the following year (Ezell).

The purchase was initially intended to be a one-time deal—enough to fill the gap until another weapons testing program was complete and a new firearm developed, but history proves that did not become the case. To meet demand for the growing conflict in Vietnam, the Army ordered more of the rifles and reclassified it as the M16.

#### NOT DONE YET

Once the AR-15/M16 made its way to soldiers' hands and was finally being tested on the battlefield, problems began to arise. While the overall opinion was that most soldiers liked the overall design and concept of the rifle, its immediate popularity was hindered by a few problems operators encountered in the field—mainly the gun malfunctioning during combat. Reviews revealed several causes for this including ammunition that didn't function properly in the rifle because of its high-residue powder. The Army had insisted on a faster-burning ball-type powder for use in the field instead of the cleaner burning powder Stoner had used in developing the rifle because they wanted



While the design of the M16 was generally well received by Vietnam-era soldiers, the model was not without its problems, primarily malfunctions when dirty.

to generate higher muzzle velocities. The Army also failed to secure chrome-lined barrels and chambers in the rifles, which resisted heat and fouling better as well as corrosion and pitting. Perhaps most egregiously ignored was the lack of proper cleaning supplies and quite simply a failure to properly train troops with the new rifle and enforce its frequent cleaning.

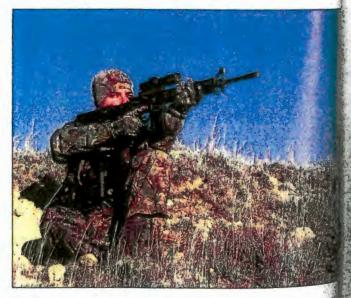
In fact, according to former long-distance AR competition shooter John Murphy, who has shot ARs extensively and studied their history, the original M16 was originally billed as a gun that didn't require much care or cleaning.

"The chamber on the .223 was not chrome plated. It got so hot that cases were sticking and with all of the gunk and powder, the gun would jam up," says Murphy. "The gun was marketed as one that didn't need cleaning, which was bunk. You have to always clean a gun." The cleaning of magazines was also found to be crucial as they would fill with grime and quit feeding rounds into the chamber during firing. Indeed when asked about how often he cleaned his M4, the military's modern, shorter version of the original M16 design, one recently retired Navy SEAL who has seen action in both Afghanistan and Iraq, said simply "every chance you get. Your life depends on it."

As more troops began carrying the new rifle into Vietnam, training and cleaning procedures-for both the rifle and its magazine—improved and with it, fewer reports of malfunctioning guns. In fact, the lack of proper cleaning seemed to fix much of what the initial concerns about the M16 were. Improvements in the propellant used in the militaryissued ammunition also reduced reports of problems with the guns.

Over the years, the gun design has undergone a number of improvements and variations as requested by various branches of the military-and even by some civilian engineers and shooters-including the addition of: a forward assist, to aid in locking the bolt forward in rare instances when it fails to do so; flat-top receivers; heavier barrels; adjustable windage rear sights; selector switch functions that reduced full-auto firing to the firing of three-round bursts; a gas piston operating system as an option to the direct impingement design; and other minor tweaks including adjustments in stock length, thickness of barrels and stock design and functionality. Where the military design has wandered, the civilian market has followed.

One of the most notable changes in the rifle over time occurred with its rifling. Original models often had a 1-in-14-inch (1:14) or 1-in-12-inch (1:12) twist for use with the lighter 55-grain bullets used for combat at the time. This worked great for shooting targets under 300 yards and indeed, most combat engagement occurred at 100 yards or less, most often due to terrain features and limitations more so than an inability of the shooter. However, for long range shooting-ranges of out to 600 yards as was required in high-power competition matches or sniping—the gun was inadequate.



Today, popularity of the AR among hunters is one of the driving forces behind the platform's high sales numbers.

To improve the M16's early performance, rifling in the barrel was changed to a 1:7 twist in order to better accommodate 62-grain bullets.



The 1:12 twist was unable to stabilize longer, heavier bullets needed for long distance shooting.

In "The Making of a Match Rifle," originally published in the July 1999 issue of American Rifleman by former Shooting Editor Glenn M. Gilbert, the author recounts how improvements in this area evolved following the adoption by NATO of a standard 5.56mm round loaded with a heavier 62-grain bullet, and which was fired from a barrel with a 1:9 twist. That bullet was designed by FN. In response, "the Army quickly developed a copy of the 62-grain FN bullet and standardized it as the M855 in 1981."

The rifling in the barrel of M16 was soon tightened to a 1:7 twist in order to accommodate the heavier bullet as well as tracers that were planned for the newly rifled firearms. Over time, the twist rate and development of longer bullets in the 77-grain and 80-grain arena solved the long range dilemma and produced a rifle that both military sharpshooters and civilian competitors could come to rely on. And indeed, once those problems were solved, the AR became a preferred guin of many competitors such as John Murphy.

"The Marines were the first ones to successfully carry the ARs to Camp Perry in 1994, and they cleaned everyone's clock with the new twist rates and the longer bullets," says Murphy.

Gilbert sums the AR's evolution up in his article by writing, "The AR-15 has come a long way. Long derided as a plastic toy, it is now the benchmark in accuracy among semi-auto rifles." It is this mix of both short-range application and long-range accuracy, combined with the multiple levels of personalization and functionality that have many experts predicting that the heyday of the AR is indeed here.

This sentiment, in fact, is continuing forward along dual paths. While there are a number of competing—and darn good—tactical rifle platforms available (the FN SCAR, HK-416 and SIG 556xi are just a few that come immediately to mind), the U.S. Army, after a

multi-year effort to find a suitable replacement for the M4 recently decided to scrap the search and commit to converting the M4 to M4A1s. The M4, successor variant of the M16, with a shorter barrel, flat top, collapsible stock and less weight, has been in use since 1994. While it has received periodic upgrades over the years, the transition to the M4A1, with a heavier barrel, full-auto firing capability and ambidextrous controls, is underway and should be complete by 2020 according to reports by the *Army Times*. From a military perspective at least, this move cements the continuation of the AR's place as the weapon of choice for many of our nation's servicemen and women on the battlefield.

Despite criticisms of the platform's ability to perform without malfunctioning in sandy or dirty environments, an *Army Times* article cites testing data that showed "today's M4 and M4A1 indicate a 98.3 percent probability of completing a mission with a basic ammunition load (209 rounds) without failure." To those supporters cheering on a new small-arms alternative to the AR, the Army scrapped the effort to find a replacement after determining that all of the potential replacements didn't provide sufficient improvements over current performance levels . . . particularly not enough to justify the additional cost it would take to swap out the entire branch's shoulder-fired weapons.

On the civilian front, increasing acceptance by competitive shooters, driven in large part by 3Gun competitors, and certainly hunters, who continue to embrace the platform, are driving high-end performance features on some models and more hunt-friendly features and broader caliber offerings on others. This latter development has been one of the most visible in recent years as manufacturers seek to keep rifles moving off shelves even as buying patterns settle into more stable, yet realistic numbers following the boom years of 2008–09 and 2012–13. But more on that later in the book.

# AR RIFLE MODELS

## 4. AR Rifle Models

Following is undoubtedly the most comprehensive listing of current AR-style rifle models available in print or on the web, though it is by no means exhaustive. The knowledgeable reader will no doubt find a favorite small manufacturer or favorite model of gun not listed here. Some companies simply have so many guns, it was impractical to list them all. Others were, for inexplicable reasons other than they were too busy, unable to respond to the authors' requests for information and photography, didn't have adequate information available on their websites (some had no websites) or they themselves didn't even have detailed information on their firearm models available. And admittedly, with so many small gunmakers coming into the fold-and just as quickly falling back out of it, capturing every manufacturer is a target even a custom-built AR couldn't hit.

Speaking of custom builders, many, if they did not make predetermined firearm packages, were not included, but are listed in appendices of this book. Likewise, even AR manufacturers whose firearms are not listed in this chapter are at least listed in an appendix at the back of this book. Please check out GuidetoARs.com frequently for updates on gun listings that were missed in this book, previews of new ARs and accessories coming to the market, tips on getting better performance out of your rifle and for detailed reviews on new AR models coming to a store shelf near you. Also, if you are an AR manufacturer and were not listed, please make us aware of your company and its offerings. Contact us through GuidetoARs.com where we will be happy to include your gun models or accessories and will know how to reach you more directly when working on the next edition of The Shooter's Bible Guide to AR-15s.

#### 2VETS ARMS 2VA BRAVO

nt

Action: semi-auto Stock: B5 Systems

Barrel: 16-in. 4140 CMOV barrel, 1:7

Sights: A2 front sight base

Weight: N/A Caliber: .556 Magazine: N/A

Features: Arms 7075-T6 billet side

charged upper receiver.

MSRP: ..... \$1,300

#### **2VA SOPMOD**

Action: semi-auto Stock: B5 Systems

Barrel: 16-in. 416R stainless steel

barrel, 1:7 RH twist

Sights: N/A Weight: N/A Caliber: 5.56 Magazine: N/A

Features: 7075-T6 billet side charged upper receiver, 7075-T6 billet lower receiver, ALG Defense GI fire controls, carbine gas system, 10-in.

quad rail.

MSRP: . . . . . . . . . . . . . . . . . \$1,499

#### **2VA NATO GENESIS SERIES**

Action: semi-auto Stock: B5 Systems

Barrel: 13.7-in. barrel, B.E. Meyers

249 flash hider Sights: N/A Weight: N/A Caliber: .556 Magazine: N/A

Features: 2VA 7075 billet A4 upper, 2VA 7075 billet lower, ambi charging

handle, M-LOK rail.

MSRP: . . . . . . . . . . . . . \$1,575

# 2VA .308 SPECIAL PURPOSE RIFLE

Action: semi-auto

Stock: B5 Systems Bravo
Rarrel: 18-in 1:10 RH twist

**Barrel**: 18-in., 1:10 RH twist, full fluted 416R stainless match-grade barrel w/ black Nitride finish

Sights: N/A

Weight: 7 lb. 13 oz. Caliber: .308 Magazine: N/A

Features: 7075-T6 matched set billet receivers, ambidextrous side charging system, ambidextrous safety selector,

two-stage trigger from Geissele Automatics (G2S-E), B5 Systems Bravo collapsible buttstock, 14-in. P3R lightweight free-float rail, 18-in. full fluted 416R stainless match-grade barrel with black Nitride finish.

MSRP: . . . . . . . . . . . . . . . . . \$1,875

#### **2VA ALPHA**

Action: semi-auto

Stock: B5 SOPMOD Alpha stock,

BCM Gunfighter grip

**Barrel**: 16-in. 416R stainless steel match barrel with full flutes

Sights: N/A Weight: N/A Caliber: 5.56 Magazine: N/A

Features: Arms 7075-T6 billet side charged upper receiver, 7075 forged lower receiver, mid-length gas system, Geissele SSA fire controls, KNS anti-

rotation pins, Battle Arms

Development ambi selector, Phase 5 enhanced side charged compatible BAD lever, 13-in. KeyMod compatible

free-float rail.

MSRP: . . . . . . . . . . . . . . . \$1,875

### APPENDIX I—AR MANUFACTURERS

2 Vets Arms www.2vetsarms.com

556 Tactical LLC www.556tactical.com

A Accurate Armory www.accuratearmory.com

Adams Arms www.adamsarms.net

Adcor Defense www.adcordefense.com

Aero Precision www.Aeroprecisionusa.com

Alexander Arms www.Alexanderarms.com

Alex Pro Firearms www.apfarmory.com

American Spirit Arms www.americanspiritarms.com

American Tactical Imports www.americantactical.us

American Firearms Manufacturing www.afmco.com

Anderson Manufacturing www.andersonrifles.com

AR57 Center www.57center.com

Ares Arms www.aresarms.com

Ares Defense www.aresdefense.com

Arsenal Democracy www.arsenaldemocracy.com

ArmaLite www.armalite.com

Armscor www.armscor.com

Arms Tech Ltd www.armstechltd.com

Astra Arms www.astra-arms.ch

AXTS Weapons www.axtsweapons.com

B Barnes Precision www.usamade-ar15parts.com

Barrett www.barrett.net

Battle Born www.battlebornusa.com

Battle Rifle Company www.battleriflecompany.com

Bazooka Brothers www.bazookabrothers.com

BCI Defense www.bcidefense.com

Black Heart International www.bhigear.com

Black Rain Ordnance www.blackrainordnance.com Black Dawn Armory www.blackdawnguns.com

Bradley Arms www.bradleyarms.com

Bravo Company USA www.bravocompanyusa.com

Bushmaster www.bushmaster.com

C Chattahoochee Gun Works www.c-gw.com

Christensen Arms www.christensenarms.com

Christian Armory Works www.christianarmoryworks.com

CMMG www.cmmginc.com

Colt Competition Rifles www.coltcompetitionrifle.com

Colt Firearms www.colt.com

Compass Lake Engineering www.compasslake.com

D
Daniel Defense
www.deztacticalarms.com

Del-Ton www.del-ton.com

DEZ Tactical www.deztacticalarms.com

Diamondback Firearms www.diamondbackfirearms.com

Double Star www.star15.com

DPMS www.dpmsinc.com

Dragon Fire Armory www.dragonfirearmory.com

Dreadnaught Industries www.dreadnaught-industries.com

DSA Arms www.dsarms.com

E Edward Arms www.edwardarms.com

Erathr3 www.erathr3.com

F Firebird Precision www.firebirdprecision.com

Fulton Armory www.fulton-armory.com

FNH USA \*\*\*Now FN America\*\*\*\*
www.fnamerica.com

Franklin Armory www.franklinarmory.com

G GAR Arms www.gar-arms.com

H Hatcher Gun Company www.hatchergun.com Head Down Products www.hdfirearms.com Hera Arms www.hera-arms.com

High Standard Firearms www.highstandard.com

HM Defense www.hmdefense.com

Heckler & Koch www.hk-usa.com

Hogan Guns www.hoganguns.com

Huldra Arms www.huldraarms.com

I Integrity Arms www.customar15.net

Invincible Arms www.invinciblearms.com

Iron Ridge Guns www.ironridgeguns.com

JARD, Inc. www.jardinc.com

Jesse James Firearms www.jjfu.com

JP Rifles www.jprifles.com

K Kaufmann Tactical Firearms www.kt-firearms.com

KE Arms www.kearms.com

Knights Armament www.knightarmco.com

L Lancer Systems www.lancer-systems.com

Larue Tactical www.larue.com

Les Baer www.lesbaer.com

Lewis Machine and Tool www.lewismachine.net

LWRC www.lwrci.com

M MGI Military www.mgi-military.com

MHT Defense www.mhtdefense.com

Midwest Industries www.midwestindustriesinc.com

MMC Armory www.mmcarmory.com

Mohawk Armory www.mohawkarmory.com

Mossberg www.mossberg.com

N NEMO Arms www.nemoarms.com Noveske Rifleworks www.noveske.com

O Olympic Arms www.olyarms.com

P Palmetto State Defense www.palmettostatedefense.com

Patriot Ordnance Factory (POF) www.pof-usa.com

PEC Armory www.pecarmory.com

Personal Defense Warehouse www.pdwarehouse.com

Precision Firearms www.precisionfirearms.com

Precision Reflex www.precisionreflex.com

Primary Weapons Systems www.primaryweapons.com

Q Quality Arms www.qualityarmsidaho.com

Quentin Defense www.quentindefense.com

R Radical Firearms ww.radicalfirearms.com

Ranger Proof www.rangerproof.com

Rebel Arms www.rebelarms.com

Red X Arms www.shop.redxarms.com

Remington Arms www.remington.com

R Guns www.rguns.net

RIP Tactical www.rip-tactical.com

RND Manufacturing www.rndrifles.com

Rock River Arms www.rockriverarms.com

Ruger www.ruger.com

S Savannah River Armory www.savannahriverarmory.com

Schmeisser Germany www.schmeisser-germany.de

Seekins Precision www.seekinsprecision.com

SLR15 Rifles www.slr15rifles.com Sharps Rifle Company

www.srcarms.com
SI Defense
www.si-defense.com

Signature Manufacturing www.signaturemanufactures.com

Sionics Weapon Systems www.sionicsweaponsystems.com

Smith & Wesson www.smith-wesson.com

Specialized Dynamics www.specializeddynamics.com

Specialized Tactical Systems www.specializedtactical.com

Spikes Tactical www.spikestactical.com

Stag Arms www.stagarms.com

Sterling Arsenal www.sterlingarsenal.com Stubborn Mule Outdoor Supply www.smosarms.com

Surplus Ammo and Arms www.surplusammo.com

Superior Arms www.superiorarms.com

S.W.O.R.D. International www.sword-int.com

T Tactical Arms Manufacturer www.tacticalarmsmfr.com

Tactical Firearms Solutions www.tfsarms.com

Teppo Jutsu www.teppojutsu.com

Texas Black Rifle Company www.tbrci.com Texas Custom Guns www.texascustomguns.net

Thor Global Defense www.thorgdg.com

TNW Firearms www.tnwfirearms.com

TR Enabling www.tr-enabling.com

Trident Arms www.tridentarms.us

U USA Tactical Firearms www.usatf.us

V Valkyrie Armament www.beltfedar.com

Vltor Weapon Systems www.vltor.com Vidalia Police Supply www.kavodcustom.com

W War Sport Industries www.warsport-us.net

Wilson Combat www.wilsoncombat.com

Windham Weaponry www.windhamweaponry.com

X Xtreme Machining www.xtrememachining.biz

Y Yankee Hill Machine www.yhm.net Sports/Shooting US \$19.99/Can \$26.99

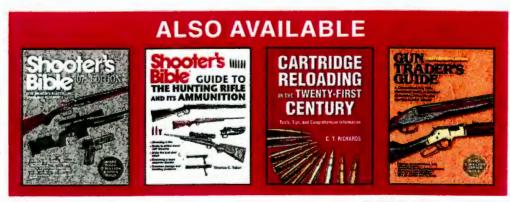
# THE MOST RECENT INFORMATION AND SPECS ON THE POPULAR AR-15 RIFLE

There's no denying the popularity and intense fascination with AR-15s among firearms enthusiasts today. Interest has grown rapidly over the past decade, spurred by the versatility of modern sporting rifles in addition to increased performance. Here, inside the most comprehensive source to date in a newly updated second edition, is Doug Howlett and Robb Manning's expert approach to everything from the intriguing history of the AR to breaking down the weapon piece by piece, choosing ammunition, and even building your own gun.

In this complete book of AR-style firearms, you can peruse the products of all manufacturers, learn about the evolution of the AR from its uses in the military in the 1960s as well as gain essential knowledge on the parts and functions of the rifle. Also included are chapters on customizing and accessorizing ARs, and much more.

**Doug Howlett** is an award-winning editor and writer who grew up hunting and shooting. He began his writing career as a newspaper reporter before combining his passions for writing and the outdoors at the National Rifle Association, where he worked as assistant editor of *American Hunter* magazine. He has served as editor-in-chief of *Turkey Call* magazine at the National Wild Turkey Federation, as well as deputy editor at *Outdoor Life* magazine in New York City. It was on a hunt he covered for *Outdoor Life* that he discovered the absolute thrill of hunting with modern tactical rifles.

ROBB MANNING grew up in southern Wisconsin before enlisting in the US Marine Corps, where he served for nearly eleven years. During this time, he developed a passion and knowledge for firearms of all types. Robb has been writing professionally since 2010, and his work has appeared in AR Guns & Hunting, Predator Xtreme, Gun Digest, and Modern Shooter. He currently has two reoccurring columns in On Wisconsin Outdoors newspaper and is the author of the Glock Quick Reference Guide and the current editor of Gun World magazine.



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(720 ILCS 5/24-1.9)

Sec. 24-1.9. Manufacture, possession, delivery, sale, and purchase of assault weapons, .50 caliber rifles, and .50 caliber cartridges.

- (a) Definitions. In this Section:
- (1) "Assault weapon" means any of the following, except as provided in subdivision (2) of this subsection:
  - (A) A semiautomatic rifle that has the capacity to accept a detachable magazine or that may be readily modified to accept a detachable magazine, if the firearm has one or more of the following:
    - (i) a pistol grip or thumbhole stock;
    - (ii) any feature capable of functioning as a protruding grip that can be held by the non-trigger hand:
    - (iii) a folding, telescoping, thumbhole, or detachable stock, or a stock that is otherwise foldable or adjustable in a manner that operates to reduce the length, size, or any other dimension, or otherwise enhances the concealability of, the weapon;
      - (iv) a flash suppressor;
      - (v) a grenade launcher;
    - (vi) a shroud attached to the barrel or that partially or completely encircles the barrel, allowing the bearer to hold the firearm with the non-trigger hand without being burned, but excluding a slide that encloses the barrel.
  - (B) A semiautomatic rifle that has a fixed magazine with the capacity to accept more than 10 rounds, except for an attached tubular device designed to accept, and capable of operating only with, .22 caliber rimfire ammunition.
  - (C) A semiautomatic pistol that has the capacity to accept a detachable magazine or that may be readily modified to accept a detachable magazine, if the firearm has one or more of the following:
    - (i) a threaded barrel;
    - (ii) a second pistol grip or another feature capable of functioning as a protruding grip that can be held by the non-trigger hand;
      - (iii) a shroud attached to the barrel or that

- partially or completely encircles the barrel, allowing the bearer to hold the firearm with the non-trigger hand without being burned, but excluding a slide that encloses the barrel;
  - (iv) a flash suppressor;
- (v) the capacity to accept a detachable magazine at some location outside of the pistol grip; or
- (vi) a buffer tube, arm brace, or other part that protrudes horizontally behind the pistol grip and is designed or redesigned to allow or facilitate a firearm to be fired from the shoulder.
- (D) A semiautomatic pistol that has a fixed magazine with the capacity to accept more than 15 rounds.
  - (E) Any shotgun with a revolving cylinder.
- (F) A semiautomatic shotgun that has one or more of the following:
  - (i) a pistol grip or thumbhole stock;
  - (ii) any feature capable of functioning as a protruding grip that can be held by the non-trigger hand;
    - (iii) a folding or thumbhole stock;
    - (iv) a grenade launcher;
  - (v) a fixed magazine with the capacity of more than 5 rounds; or
  - (vi) the capacity to accept a detachable magazine.
- (G) Any semiautomatic firearm that has the capacity to accept a belt ammunition feeding device.
- (H) Any firearm that has been modified to be operable as an assault weapon as defined in this Section.
- (I) Any part or combination of parts designed or intended to convert a firearm into an assault weapon, including any combination of parts from which an assault weapon may be readily assembled if those parts are in the possession or under the control of the same person.
- (J) All of the following rifles, copies, duplicates, variants, or altered facsimiles with the capability of any such weapon:
  - (i) All AK types, including the following:
  - (I) AK, AK47, AK47S, AK-74, AKM, AKS, ARM, MAK90, MISR, NHM90, NHM91, SA85, SA93, Vector Arms AK-47, VEPR, WASR-10, and WUM.
    - (II) IZHMASH Saiga AK.
    - (III) MAADI AK47 and ARM.
    - (IV) Norinco 56S, 56S2, 84S, and 86S.
    - (V) Poly Technologies AK47 and AKS.
    - (VI) SKS with a detachable magazine.
  - (ii) all AR types, including the following:
    - (I) AR-10.
    - (II) AR-15.
    - (III) Alexander Arms Overmatch Plus 16.
    - -(IV) Armalite M15 22LR Carbine.
    - (V) Armalite M15-T.
    - (VI) Barrett REC7.
    - → (VII) Beretta AR-70.
      - (VIII) Black Rain Ordnance Recon Scout.
    - -(IX) Bushmaster ACR.
      - (X) Bushmaster Carbon 15.
      - (XI) Bushmaster MOE series.
      - (XII) Bushmaster XM15.
    - (XIII) Chiappa Firearms MFour rifles.
      - (XIV) Colt Match Target rifles.

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(XV) CORE Rifle Systems CORE15 rifles.
       (XVI) Daniel Defense M4A1 rifles.
       (XVII) Devil Dog Arms 15 Series rifles.
       (XVIII) Diamondback DB15 rifles.
       (XIX) DoubleStar AR rifles.
       (XX) DPMS Tactical rifles.
       (XXI) DSA Inc. ZM-4 Carbine.
       (XXII) Heckler & Koch MR556.
       (XXIII) High Standard HSA-15 rifles.
       (XXIV) Jesse James Nomad AR-15 rifle.
       (XXV) Knight's Armament SR-15.
       (XXVI) Lancer L15 rifles.
       (XXVII) MGI Hydra Series rifles.
       (XXVIII) Mossberg MMR Tactical rifles.
       (XXIX) Noreen Firearms BN 36 rifle.
       (XXX) Olympic Arms.
       (XXXI) POF USA P415.
       (XXXII) Precision Firearms AR rifles.
       (XXXIII) Remington R-15 rifles.
       (XXXIV) Rhino Arms AR rifles.
       (XXXV) Rock River Arms LAR-15 or Rock River
    Arms LAR-47.
    - (XXXVI) Sig Sauer SIG516 rifles and MCX
    rifles.
       (XXXVII) Smith & Wesson M&P15 rifles.
       (XXXVIII) Stag Arms AR rifles.
       (XXXIX) Sturm, Ruger & Co. SR556 and AR-556
    rifles.
       (XL) Uselton Arms Air-Lite M-4 rifles.
       (XLI) Windham Weaponry AR rifles.
       (XLII) WMD Guns Big Beast.
       (XLIII) Yankee Hill Machine Company, Inc.
    YHM-15 rifles.
   (iii) Barrett M107A1.
   (iv) Barrett M82A1.
   (v) Beretta CX4 Storm.
   (vi) Calico Liberty Series.
   (vii) CETME Sporter.
   (viii) Daewoo K-1, K-2, Max 1, Max 2, AR 100, and
AR 110C.
   (ix) Fabrique Nationale/FN Herstal FAL, LAR, 22
FNC, 308 Match, L1A1 Sporter, PS90, SCAR, and FS2000.
   (x) Feather Industries AT-9.
   (xi) Galil Model AR and Model ARM.
   (xii) Hi-Point Carbine.
   (xiii) HK-91, HK-93, HK-94, HK-PSG-1, and HK USC.
   (xiv) IWI TAVOR, Galil ACE rifle.
   (xv) Kel-Tec Sub-2000, SU-16, and RFB.
   (xvi) SIG AMT, SIG PE-57, Sig Sauer SG 550, Sig
Sauer SG 551, and SIG MCX.
   (xvii) Springfield Armory SAR-48.
   (xviii) Steyr AUG.
   (xix) Sturm, Ruger & Co. Mini-14 Tactical Rifle
M-14/20CF.
   (xx) All Thompson rifles, including the
following:
       (I) Thompson M1SB.
       (II) Thompson T1100D.
       (III) Thompson T150D.
       (IV) Thompson T1B.
       (V) Thompson T1B100D.
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(VI) Thompson T1B50D.
           (VII) Thompson T1BSB.
           (VIII) Thompson T1-C.
           (IX) Thompson T1D.
           (X) Thompson T1SB.
           (XI) Thompson T5.
           (XII) Thompson T5100D.
           (XIII) Thompson TM1.
           (XIV) Thompson TM1C.
       (xxi) UMAREX UZI rifle.
       (xxii) UZI Mini Carbine, UZI Model A Carbine, and
    UZI Model B Carbine.
       (xxiii) Valmet M62S, M71S, and M78.
       (xxiv) Vector Arms UZI Type.
       (xxv) Weaver Arms Nighthawk.
       (xxvi) Wilkinson Arms Linda Carbine.
   (K) All of the following pistols, copies, duplicates,
variants, or altered facsimiles with the capability of any
such weapon thereof:
       (i) All AK types, including the following:
           (I) Centurion 39 AK pistol.
           (II) CZ Scorpion pistol.
           (III) Draco AK-47 pistol.
           (IV) HCR AK-47 pistol.
           (V) IO Inc. Hellpup AK-47 pistol.
           (VI) Krinkov pistol.
           (VII) Mini Draco AK-47 pistol.
           (VIII) PAP M92 pistol.
           (IX) Yugo Krebs Krink pistol.
       (ii) All AR types, including the following:
           (I) American Spirit AR-15 pistol.
           (II) Bushmaster Carbon 15 pistol.
           (III) Chiappa Firearms M4 Pistol GEN II.
           (IV) CORE Rifle Systems CORE15 Roscoe pistol.
           (V) Daniel Defense MK18 pistol.
           (VI) DoubleStar Corporation AR pistol.
           (VII) DPMS AR-15 pistol.
           (VIII) Jesse James Nomad AR-15 pistol.
           (IX) Olympic Arms AR-15 pistol.
           (X) Osprey Armament MK-18 pistol.
           (XI) POF USA AR pistols.
           (XII) Rock River Arms LAR 15 pistol.
           (XIII) Uselton Arms Air-Lite M-4 pistol.
       (iii) Calico pistols.
       (iv) DSA SA58 PKP FAL pistol.
       (v) Encom MP-9 and MP-45.
       (vi) Heckler & Koch model SP-89 pistol.
       (vii) Intratec AB-10, TEC-22 Scorpion, TEC-9, and
    TEC-DC9.
       (viii) IWI Galil Ace pistol, UZI PRO pistol.
       (ix) Kel-Tec PLR 16 pistol.
       (x) All MAC types, including the following:
           (I) MAC-10.
           (II) MAC-11.
           (III) Masterpiece Arms MPA A930 Mini Pistol,
       MPA460 Pistol, MPA Tactical Pistol, and MPA Mini
        Tactical Pistol.
           (IV) Military Armament Corp. Ingram M-11.
           (V) Velocity Arms VMAC.
       (xi) Sig Sauer P556 pistol.
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- (xii) Sites Spectre.
- (xiii) All Thompson types, including the following:
  - (I) Thompson TA510D.
  - (II) Thompson TA5.
  - (xiv) All UZI types, including Micro-UZI.
- (L) All of the following shotguns, copies, duplicates, variants, or altered facsimiles with the capability of any such weapon thereof:
  - (i) DERYA Anakon MC-1980, Anakon SD12.
  - (ii) Doruk Lethal shotguns.
  - (iii) Franchi LAW-12 and SPAS 12.
  - (iv) All IZHMASH Saiga 12 types, including the following:
    - (I) IZHMASH Saiga 12.
    - (II) IZHMASH Saiga 12S.
    - (III) IZHMASH Saiga 12S EXP-01.
    - (IV) IZHMASH Saiga 12K.
    - (V) IZHMASH Saiga 12K-030.
    - (VI) IZHMASH Saiga 12K-040 Taktika.
    - (v) Streetsweeper.
    - (vi) Striker 12.
- (2) "Assault weapon" does not include:
- (A) Any firearm that is an unserviceable firearm or has been made permanently inoperable.
- (B) An antique firearm or a replica of an antique firearm.
- (C) A firearm that is manually operated by bolt, pump, lever or slide action, unless the firearm is a shotgun with a revolving cylinder.
- (D) Any air rifle as defined in Section 24.8-0.1 of this Code.
- (E) Any handgun, as defined under the Firearm Concealed Carry Act, unless otherwise listed in this Section.
- (3) "Assault weapon attachment" means any device capable of being attached to a firearm that is specifically designed for making or converting a firearm into any of the firearms listed in paragraph (1) of this subsection (a).
- (4) "Antique firearm" has the meaning ascribed to it in 18 U.S.C. 921(a)(16).
- (5) ".50 caliber rifle" means a centerfire rifle capable of firing a .50 caliber cartridge. The term does not include any antique firearm, any shotgun including a shotgun that has a rifle barrel, or any muzzle-loader which uses black powder for hunting or historical reenactments.
- (6) ".50 caliber cartridge" means a cartridge in .50 BMG caliber, either by designation or actual measurement, that is capable of being fired from a centerfire rifle. The term ".50 caliber cartridge" does not include any memorabilia or display item that is filled with a permanent inert substance or that is otherwise permanently altered in a manner that prevents ready modification for use as live ammunition or shotgun ammunition with a caliber measurement that is equal to or greater than .50 caliber.
- (7) "Detachable magazine" means an ammunition feeding device that may be removed from a firearm without disassembly of the firearm action, including an ammunition feeding device that may be readily removed from a firearm with the use of a bullet, cartridge, accessory, or other tool, or any other object that functions as a tool, including a bullet or cartridge.
- (8) "Fixed magazine" means an ammunition feeding device that is permanently attached to a firearm, or contained in and not

- removable from a firearm, or that is otherwise not a detachable magazine, but does not include an attached tubular device designed to accept, and capable of operating only with, .22 caliber rimfire ammunition.
- (b) Except as provided in subsections (c), (d), and (e), on or after the effective date of this amendatory Act of the 102nd General Assembly, it is unlawful for any person within this State to knowingly manufacture, deliver, sell, import, or purchase or cause to be manufactured, delivered, sold, imported, or purchased by another, an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge.
- (c) Except as otherwise provided in subsection (d), beginning January 1, 2024, it is unlawful for any person within this State to knowingly possess an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge.
- (d) This Section does not apply to a person's possession of an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge device if the person lawfully possessed that assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge prohibited by subsection (c) of this Section, if the person has provided in an endorsement affidavit, prior to January 1, 2024, under oath or affirmation and in the form and manner prescribed by the Illinois State Police, no later than October 1, 2023:
  - (1) the affiant's Firearm Owner's Identification Card number;
  - (2) an affirmation that the affiant: (i) possessed an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge before the effective date of this amendatory Act of the 102nd General Assembly; or (ii) inherited the assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge from a person with an endorsement under this Section or from a person authorized under subdivisions (1) through (5) of subsection (e) to possess the assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge; and
  - (3) the make, model, caliber, and serial number of the .50 caliber rifle or assault weapon or assault weapons listed in paragraphs (J), (K), and (L) of subdivision (1) of subsection (a) of this Section possessed by the affiant prior to the effective date of this amendatory Act of the 102nd General Assembly and any assault weapons identified and published by the Illinois State Police pursuant to this subdivision (3). No later than October 1, 2023, and every October 1 thereafter, the Illinois State Police shall, via rulemaking, identify, publish, and make available on its website, the list of assault weapons subject to an endorsement affidavit under this subsection (d). The list shall identify, but is not limited to, the copies, duplicates, variants, and altered facsimiles of the assault weapons identified in paragraphs (J), (K), and (L) of subdivision (1) of subsection (a) of this Section and shall be consistent with the definition of "assault weapon" identified in this Section. The Illinois State Police may adopt emergency rulemaking in accordance with Section 5-45 of the Illinois Administrative Procedure Act. The adoption of emergency rules authorized by Section 5-45 of the Illinois Administrative Procedure Act and this paragraph is deemed to be necessary for the public interest, safety, and

The affidavit form shall include the following statement printed in bold type: "Warning: Entering false information on this form is punishable as perjury under Section 32-2 of the Criminal Code of 2012. Entering false information on this form

is a violation of the Firearm Owners Identification Card Act."

In any administrative, civil, or criminal proceeding in this State, a completed endorsement affidavit submitted to the Illinois State Police by a person under this Section creates a rebuttable presumption that the person is entitled to possess and transport the assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge.

Beginning 90 days after the effective date of this amendatory Act of the 102nd General Assembly, a person authorized under this Section to possess an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge shall possess such items only:

- (1) on private property owned or immediately controlled by the person;
- (2) on private property that is not open to the public with the express permission of the person who owns or immediately controls such property;
- (3) while on the premises of a licensed firearms dealer or gunsmith for the purpose of lawful repair;
- (4) while engaged in the legal use of the assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge at a properly licensed firing range or sport shooting competition venue; or
- (5) while traveling to or from these locations, provided that the assault weapon, assault weapon attachment, or .50 caliber rifle is unloaded and the assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge is enclosed in a case, firearm carrying box, shipping box, or other container.

Beginning on January 1, 2024, the person with the endorsement for an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge or a person authorized under subdivisions (1) through (5) of subsection (e) to possess an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge may transfer the assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge only to an heir, an individual residing in another state maintaining it in another state, or a dealer licensed as a federal firearms dealer under Section 923 of the federal Gun Control Act of 1968. Within 10 days after transfer of the weapon except to an heir, the person shall notify the Illinois State Police of the name and address of the transferee and comply with the requirements of subsection (b) of Section 3 of the Firearm Owners Identification Card Act. The person to whom the weapon or ammunition is transferred shall, within 60 days of the transfer, complete an affidavit required under this Section. A person to whom the weapon is transferred may transfer it only as provided in this subsection.

Except as provided in subsection (e) and beginning on January 1, 2024, any person who moves into this State in possession of an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge shall, within 60 days, apply for a Firearm Owners Identification Card and complete an endorsement application as outlined in subsection (d).

Notwithstanding any other law, information contained in the endorsement affidavit shall be confidential, is exempt from disclosure under the Freedom of Information Act, and shall not be disclosed, except to law enforcement agencies acting in the performance of their duties.

(e) The provisions of this Section regarding the purchase or possession of assault weapons, assault weapon attachments, .50 caliber rifles, and .50 cartridges, as well as the provisions of this Section that prohibit causing those items to be purchased

or possessed, do not apply to:

- (1) Peace officers, as defined in Section 2-13 of this Code.
- (2) Qualified law enforcement officers and qualified retired law enforcement officers as defined in the Law Enforcement Officers Safety Act of 2004 (18 U.S.C. 926B and 926C) and as recognized under Illinois law.
- (3) Acquisition and possession by a federal, State, or local law enforcement agency for the purpose of equipping the agency's peace officers as defined in paragraph (1) or (2) of this subsection (e).
- (4) Wardens, superintendents, and keepers of prisons, penitentiaries, jails, and other institutions for the detention of persons accused or convicted of an offense.
- (5) Members of the Armed Services or Reserve Forces of the United States or the Illinois National Guard, while performing their official duties or while traveling to or from their places of duty.
- (6) Any company that employs armed security officers in this State at a nuclear energy, storage, weapons, or development site or facility regulated by the federal Nuclear Regulatory Commission and any person employed as an armed security force member at a nuclear energy, storage, weapons, or development site or facility regulated by the federal Nuclear Regulatory Commission who has completed the background screening and training mandated by the rules and regulations of the federal Nuclear Regulatory Commission and while performing official duties.
- (7) Any private security contractor agency licensed under the Private Detective, Private Alarm, Private Security, Fingerprint Vendor, and Locksmith Act of 2004 that employs private security contractors and any private security contractor who is licensed and has been issued a firearm control card under the Private Detective, Private Alarm, Private Security, Fingerprint Vendor, and Locksmith Act of 2004 while performing official duties.

The provisions of this Section do not apply to the manufacture, delivery, sale, import, purchase, or possession of an assault weapon, assault weapon attachment, .50 caliber rifle, or .50 caliber cartridge or causing the manufacture, delivery, sale, importation, purchase, or possession of those items:

- (A) for sale or transfer to persons authorized under subdivisions (1) through (7) of this subsection (e) to possess those items;
- (B) for sale or transfer to the United States or any department or agency thereof; or
- (C) for sale or transfer in another state or for export.

This Section does not apply to or affect any of the following:

(i) Possession of any firearm if that firearm is sanctioned by the International Olympic Committee and by USA Shooting, the national governing body for international shooting competition in the United States, but only when the firearm is in the actual possession of an Olympic target shooting competitor or target shooting coach for the purpose of storage, transporting to and from Olympic target shooting practice or events if the firearm is broken down in a nonfunctioning state, is not immediately accessible, or is unloaded and enclosed in a firearm case, carrying box, shipping box, or other similar portable container designed for the safe transportation of firearms, and when the Olympic target shooting competitor or target shooting coach is engaging in those practices or events. For the purposes

- of this paragraph (8), "firearm" has the meaning provided in Section 1.1 of the Firearm Owners Identification Card Act.
- (ii) Any nonresident who transports, within 24 hours, a weapon for any lawful purpose from any place where the nonresident may lawfully possess and carry that weapon to any other place where the nonresident may lawfully possess and carry that weapon if, during the transportation, the weapon is unloaded, and neither the weapon nor any ammunition being transported is readily accessible or is directly accessible from the passenger compartment of the transporting vehicle. In the case of a vehicle without a compartment separate from the driver's compartment, the weapon or ammunition shall be contained in a locked container other than the glove compartment or console.
- (iii) Possession of a weapon at an event taking place at the World Shooting and Recreational Complex at Sparta, only while engaged in the legal use of the weapon, or while traveling to or from that location if the weapon is broken down in a nonfunctioning state, is not immediately accessible, or is unloaded and enclosed in a firearm case, carrying box, shipping box, or other similar portable container designed for the safe transportation of firearms.
- (iv) Possession of a weapon only for hunting use expressly permitted under the Wildlife Code, or while traveling to or from a location authorized for this hunting use under the Wildlife Code if the weapon is broken down in a nonfunctioning state, is not immediately accessible, or is unloaded and enclosed in a firearm case, carrying box, shipping box, or other similar portable container designed for the safe transportation of firearms. By October 1, 2023, the Illinois State Police, in consultation with the Department of Natural Resources, shall adopt concerning the list of applicable weapons approved under this subparagraph (iv). The Illinois State Police may adopt emergency rules in accordance with Section 5-45 of the Illinois Administrative Procedure Act. The adoption of emergency rules authorized by Section 5-45 of the Illinois Administrative Procedure Act and this paragraph is deemed to be necessary for the public interest, safety, and welfare.
- (v) The manufacture, transportation, possession, sale, or rental of blank-firing assault weapons and .50 caliber rifles, or the weapon's respective attachments, to persons authorized or permitted, or both authorized and permitted, to acquire and possess these weapons or attachments for the purpose of rental for use solely as props for a motion picture, television, or video production or entertainment event.

Any person not subject to this Section may submit an endorsement affidavit if the person chooses.

- (f) Any sale or transfer with a background check initiated to the Illinois State Police on or before the effective date of this amendatory Act of the 102nd General Assembly is allowed to be completed after the effective date of this amendatory Act once an approval is issued by the Illinois State Police and any applicable waiting period under Section 24-3 has expired.
- (g) The Illinois State Police shall take all steps necessary to carry out the requirements of this Section within by October 1, 2023.
- (h) The Department of the State Police shall also develop and implement a public notice and public outreach campaign to promote awareness about the provisions of this amendatory Act of the 102nd General Assembly and to increase compliance with this Section.

(Source: P.A. 102-1116, eff. 1-10-23.)

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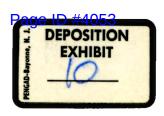
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# Exhibit B-10



#### **State of Illinois**



#### **Assault Weapon Identification Guide**

As listed or described in Illinois Compiled Statutes 720 ILCS 5/24-1.9

The purpose of this guide is to assist Law Enforcement Officers, Firearms Dealers, and the general public in the identification of assault weapons, as defined in the recently enacted Protect Illinois Communities Act. The Illinois State Police has prepared this guide in accordance with 720 ILCS 5/24-1.9(d)(3).

Version 2023.10.01

#### **Table of Contents**

Section (a) Definitions	Page 3
Section (a)(1)(A) Semiautomatic rifles (defined features)	Page 3
Section (a)(1)(B) Semiautomatic rifles with fixed magazines	Page 7
Section (a)(1)(C) Semiautomatic pistols (defined features)	Page 8
Section (a)(1)(D) Semiautomatic pistols with fixed magazines	Page 12
Section (a)(1)(E) Any shotgun with a revolving cylinder	Page 13
Section (a)(1)(F) Semiautomatic shotguns (defined features)	Page 14
Section (a)(1)(G) Semiautomatic firearms with feed belts	Page 16
Section (a)(1)(H) Firearms modified to be assault weapons	Page 17
Section (a)(1)(I) Parts and combinations of parts	Page 18
Section (a)(1)(J)(i) AK-type rifles	Page 19
Other AK-type rifles, as defined in Section (a)(1)(A)	Page 25
Section (a)(1)(J)(ii) AR-type rifles	Page 27
Other AR-type rifles, as defined in Section (a)(1)(A)	Page 39
Other semiautomatic rifles as listed in Section (a)(1)(J)	Page 43
Section (a)(1)(K)(i) AK-type pistols	Page 56
Other AK-type pistols, as defined in Section (a)(1)(C)	Page 59
Section (a)(1)(K)(i) AR-type pistols	Page 61
Other AR-type pistols, as defined in Section (a)(1)(C)	Page 65
Other semiautomatic pistols as listed in Section (a)(1)(K)	Page 68
Section (a)(1)(L) Shotguns	Page 79
Features Flowchart – Rifles	Page 83
Features Flowchart – Pistols	Page 84
Features Flowchart – Shotguns	Page 85

#### (a) Definitions. In this Section:

#### (1) "Assault weapon" means any of the following...

(A) A semiautomatic rifle that has the capacity to accept a detachable magazine or that may be readily modified to accept a detachable magazine, if the firearm has one or more of the following:

Red arrows point to the prohibited feature. Images depict representative examples of the prohibited feature; other configurations exist.

(A)(i) a pistol grip or thumbhole stock;



(A)(ii) any feature capable of functioning as a protruding grip that can be held by the non-trigger hand;



(A)(iii) a folding, telescoping, thumbhole, or detachable stock, or a stock that is otherwise foldable or adjustable in a manner that operates to reduce the length, size, or any other dimension, or otherwise enhances the concealability of, the weapon;

(1)("")	D. W.	, the weapon;
(A)(iii)	Folding stock	
(A)(iii)	Telescoping	



(A)(vi) a shroud attached to the barrel or that partially or completely encircles the barrel, allowing the bearer to hold the firearm with the non-trigger hand without being burned, but excluding a slide that encloses the barrel.

(A)(vi)	Shroud	
		[Self-lineared]

(B) A semiautomatic rifle that has a fixed magazine with the capacity to accept more than 10 rounds, except for an attached tubular device designed to accept, and capable of operating only with, .22 caliber rimfire ammunition.

(B) Fixed magazine, capacity of more than 10 rounds

Pictured: SKS with fixed, 20 round capacity magazine.

(C) A semiautomatic pistol that has the capacity to accept a detachable magazine or that may be readily modified to accept a detachable magazine, if the firearm has one or more of the following:

(C)(i) a threaded barrel;

C)(i)

Threaded barrel



(C)(ii) a second pistol grip or another feature capable of functioning as a protruding grip that can be held by the non-trigger hand;

(C)(ii)	Second pistol grip (or other protruding
	grip)



(C)(iii) a shroud attached to the barrel or that partially or completely encircles the barrel, allowing the bearer to hold the firearm with the non-trigger hand without being burned, but excluding a slide that encloses the barrel;

(C)(iii) Shroud

(C)(iv) a flash suppressor;

(C)(iv) Flash suppressor

(C)(v) the capacity to accept a detachable magazine at some location outside of the pistol grip; or

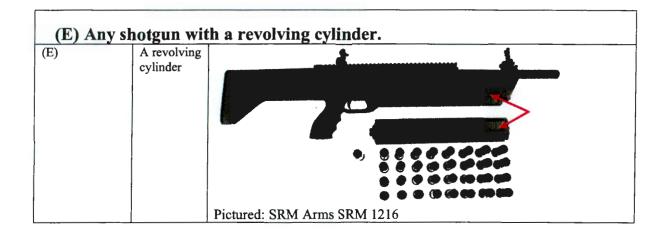


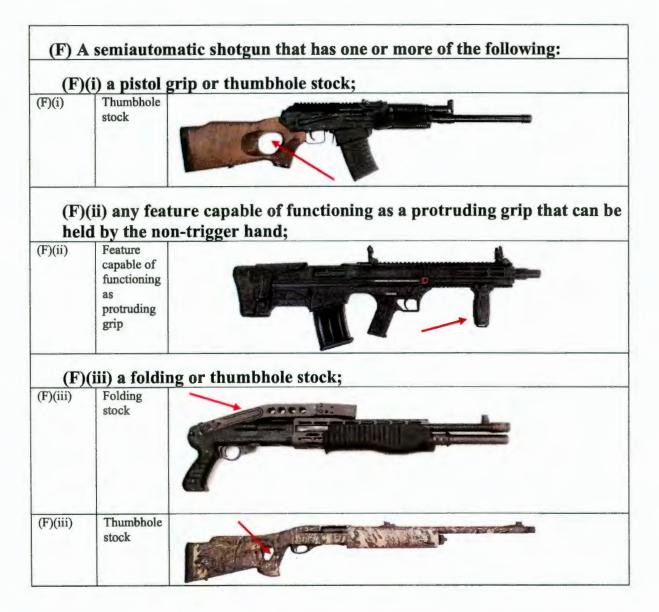
(C)(vi) a buffer tube, arm brace, or other part that protrudes horizontally behind the pistol grip and is designed or redesigned to allow or facilitate a firearm to be fired from the shoulder.

		med from the shoulder.
(C)(vi)	Buffer tube	
(C)(vi)	Arm brace	

(C)(vi)	Other part that protrudes horizontally behind pistol grip	
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(D) A semiautomatic pistol that has a fixed magazine with the capacity to accept more than 15 rounds.		
(D)	Fixed magazine with capacity to accept more than 15 rounds	
		Pictured: Mauser, C96 "Broomhandle" (w/ fixed 20 round magazine)





(F)(iv) a grenade launcher;

(F)(iv)

Grenade launcher



Pictured: Saiga 12 gauge semiautomatic shotgun with 37 mm flare launcher attached under the barrel. Grenade launcher will look similar.

## (F)(v) a fixed magazine with the capacity of more than 5 rounds; or

(F)(v)

Fixed magazine with capacity of more than 5 rounds



Pictured: Tavor TS12 – three fixed magazine tubes, each holding up to five 2 3/4" 12 gauge shells

### (F)(vi) the capacity to accept a detachable magazine.

(F)(vi)

Capacity to accept a detachable magazine



(G) Any semiautomatic firearm that has the capacity to accept a belt ammunition feeding device.

(G) Any semiautomatic firearm that has capacity to accept a belt ammunition feeding device

Pictured: Belt-fed, semiautomatic, RPD rifle

### (H) Any firearm that has been modified to be operable as an assault weapon as defined in this Section. Any firearm (H) that has been modified to be operable as an assault weapon [as defined by Unmodified Ruger, model 10/22 (not restricted) 720 ILCS 5/24-1.9 (a)(1)Ruger, model 10/22, with aftermarket collapsible stock, pistol grip, and large capacity magazine (restricted)

(I) Any part or combination of parts designed or intended to convert a firearm into an assault weapon, including any combination of parts from

which an assault weapon may be readily assembled if those parts are in the possession or under the control of the same person. (T) Combination of parts designed or intended to convert a firearm into Semiautomatic SKS Rifle with fixed, ten-round capacity magazine (not an assault restricted on its own) weapon. Combination of parts: Semiautomatic SKS rifle, plus pistol grip collapsible stock, plus detachable magazine, plus flash suppressor (combination of parts is restricted)

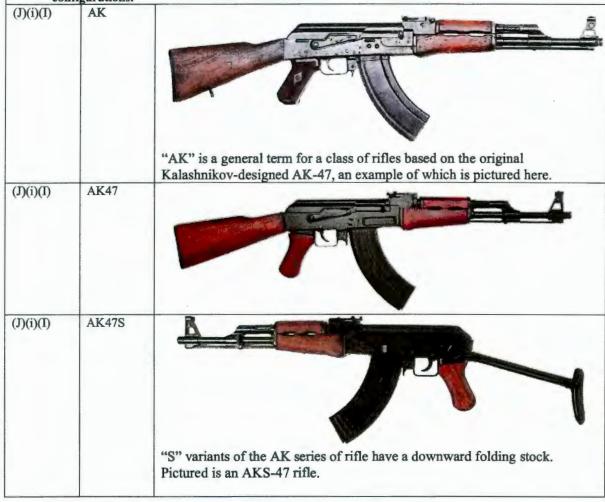
Semiautomatic SKS with above listed parts installed (restricted)

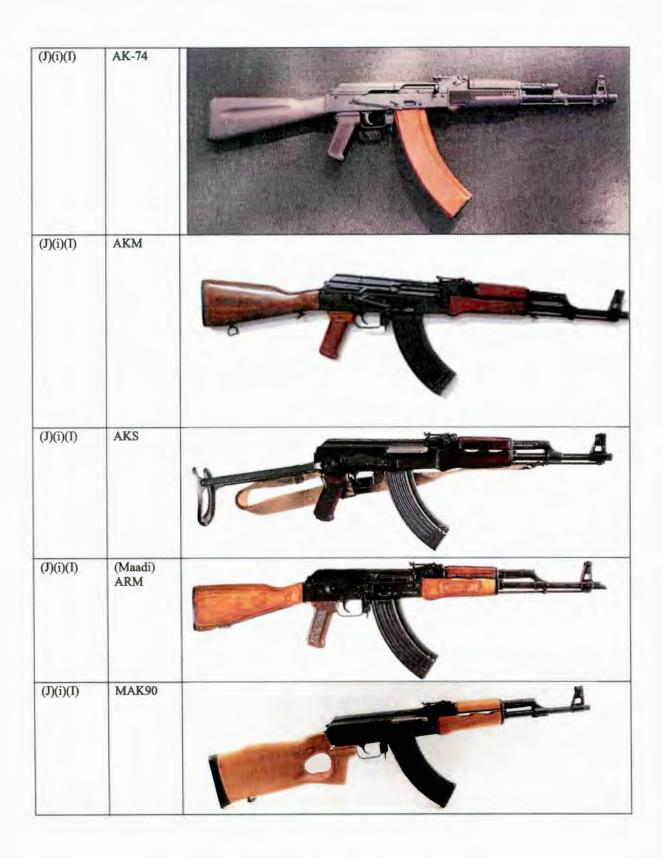
#### Statutory List of Restricted AK Types

- (J) All of the following rifles, copies, duplicates, variants, or altered facsimiles with the capability of any such weapon:
  - (i) All AK types, including the following:

(J)(i)(I) AK, AK47, AK47S, AK-74, AKM, AKS, ARM, MAK90, MISR, NHM90, NHM91, SA85, SA93, Vector Arms AK-47, VEPR, WASR-10, and WUM.

In each instance, a representative image is provided; however, these firearms may be found in various configurations.

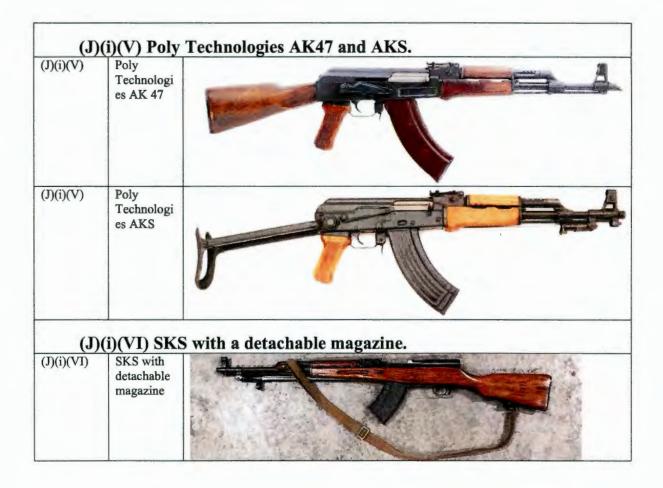




(J)(i)(I)	(Maadi) MISR	
(J)(i)(I)	NHM90 (with thumbhole stock)	
(J)(i)(I)	Norinco NHM91	A A
(J)(i)(I)	FEG SA85	
(J)(i)(I)	Arsenal (Bulgaria) SA93	
(J)(i)(I)	Vector Arms AK- 47 (AKS)	



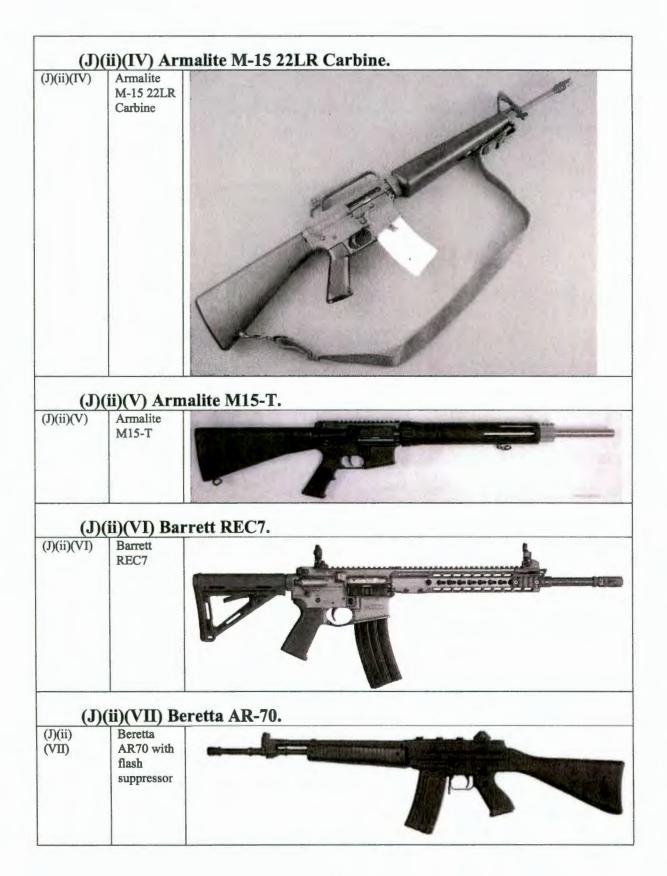




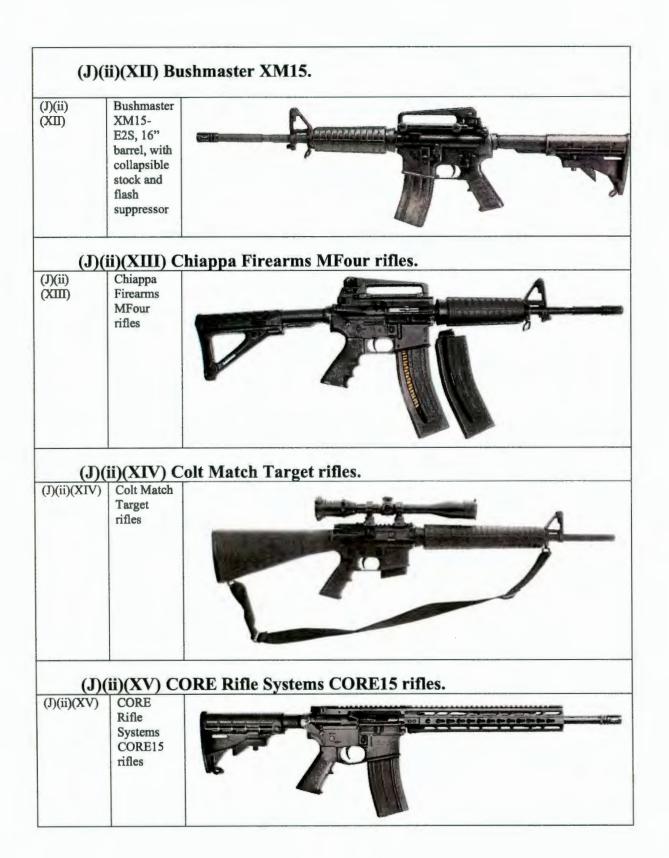




# **Statutory List of AR Types** (J)(ii) all AR types, including the following: In each instance, a representative image is provided; however, these firearms may be found in various configurations. (J)(ii)(I) AR-10. (J)(ii)(I) DPMS LR-243 AR-10 (J)(ii)(II) AR-15. (J)(ii)(II) Colt LE6920 Series AR-15, 16" barrel, with collapsible stock, vertical fore grip, and flash suppressor (J)(ii)(III) Alexander Arms Overmatch Plus 16. (J)(ii)(III) Alexander Arms Overmatch Plus 16



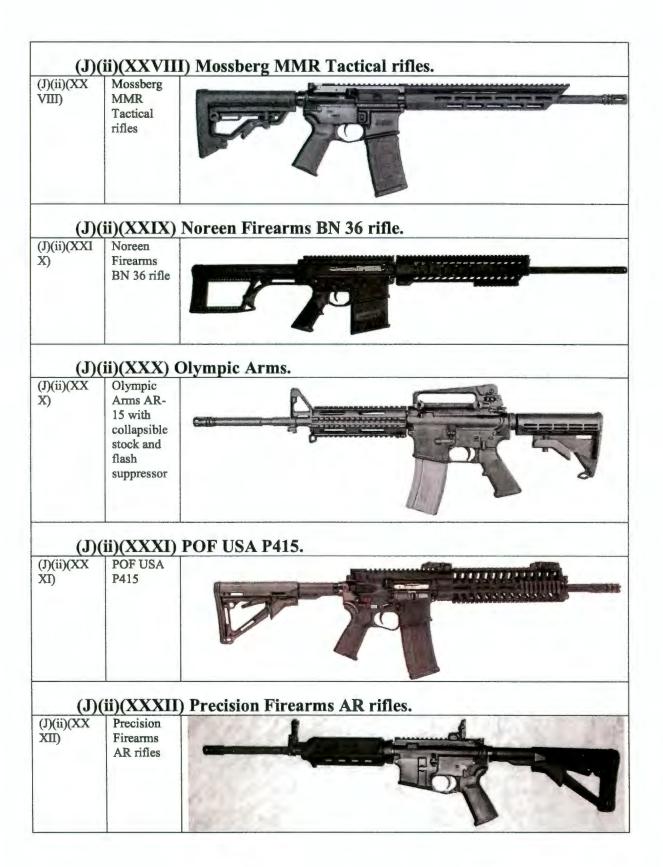


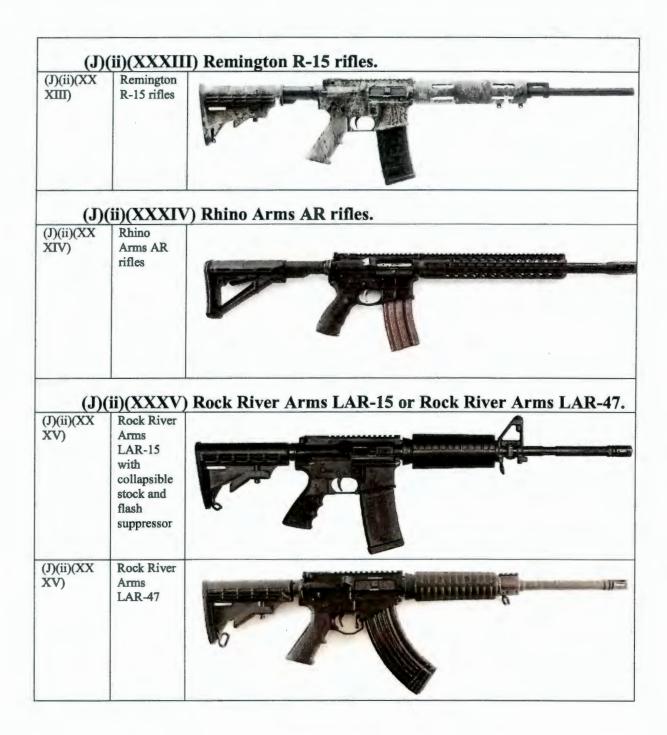




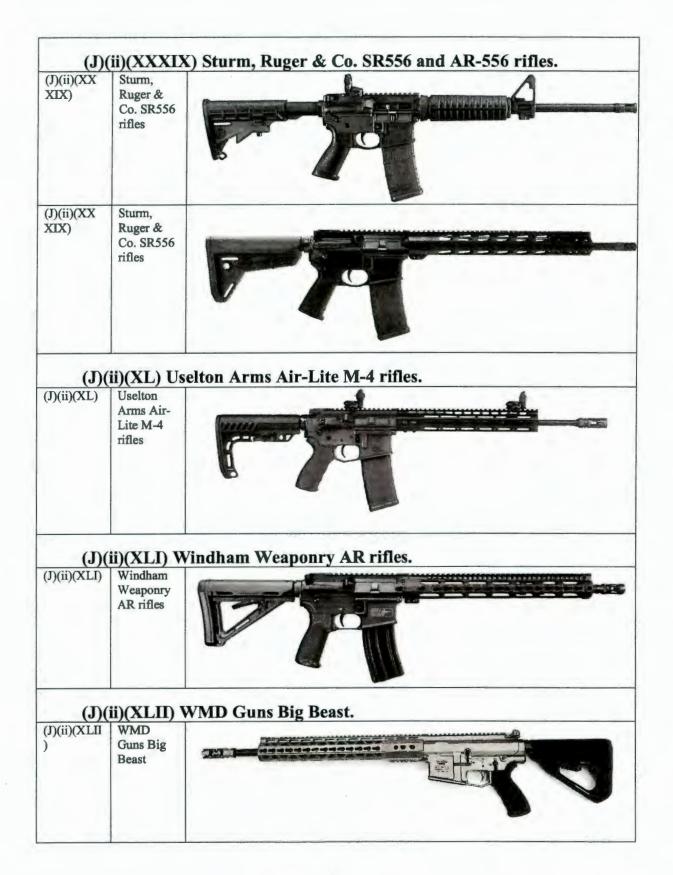




















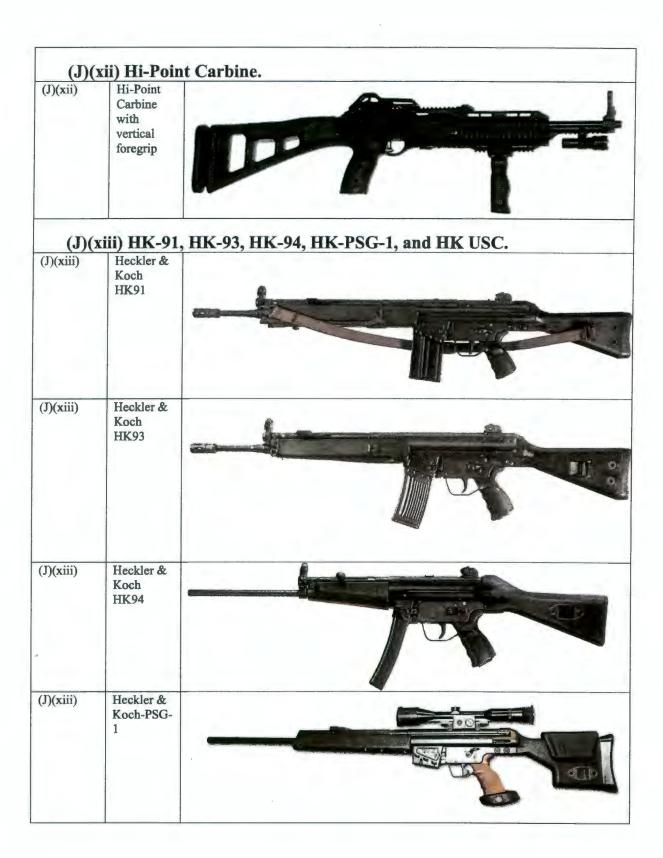


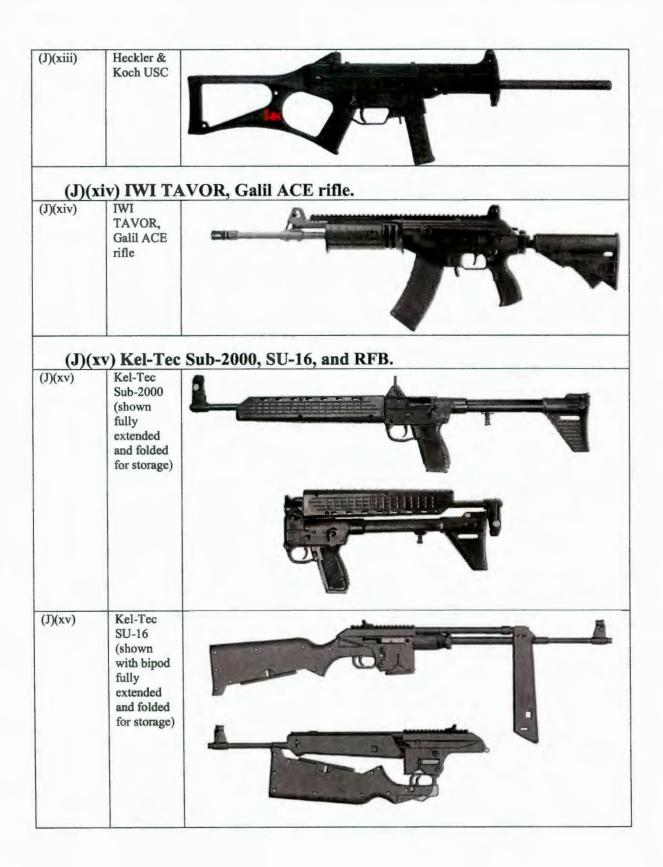




(J)(ix)	Fabrique Nationale FAL	S90, SCAR, and FS2000.
(J)(ix)	Fabrique Nationale LAR	
(J)(ix)	Fabrique Nationale 22 FNC	
(J)(ix)	Fabrique Nationale 308 Match	
(J)(ix)	Century Arms Fabrique Nationale FAL L1A1 Sporter	
(J)(ix)	Fabrique Nationale PS90	





















# (K) All of the following pistols, copies, duplicates, variants, or altered facsimiles with the capability of any such weapon thereof:

#### (K)(i) All AK types, including the following:

(K)(i)(I) Centurion 39 AK pistol.

(K)(i)(I) Centurion 39 AK pistol



#### (K)(i)(II) CZ Scorpion pistol.

(K)(i)(II)

Scorpion pistol



### (K)(i)(III) Draco AK-47 pistol.

(K)(i)(III)

Draco AK-47 pistol

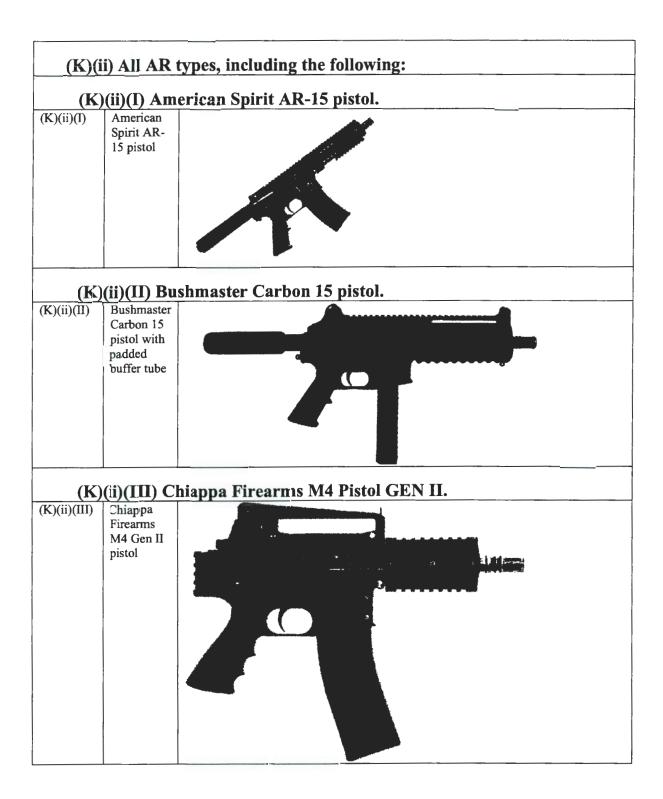






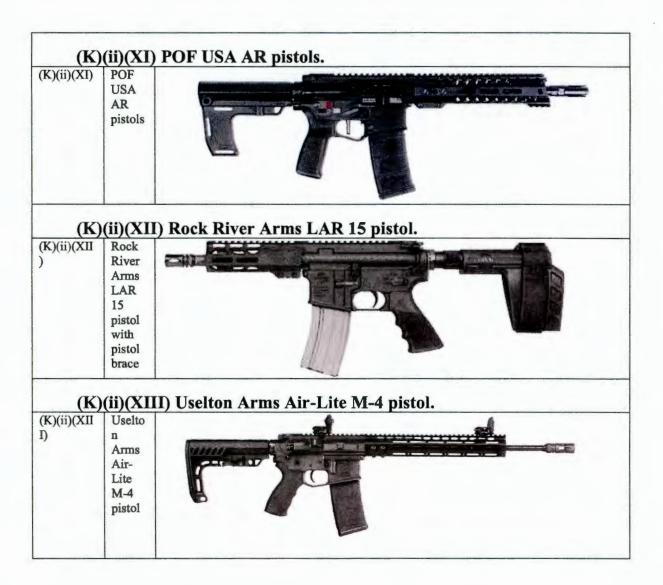










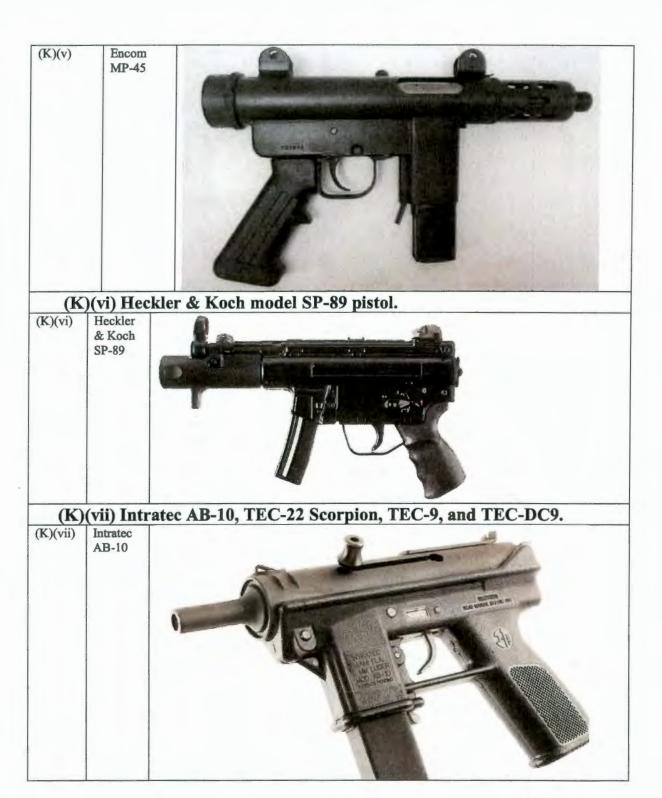












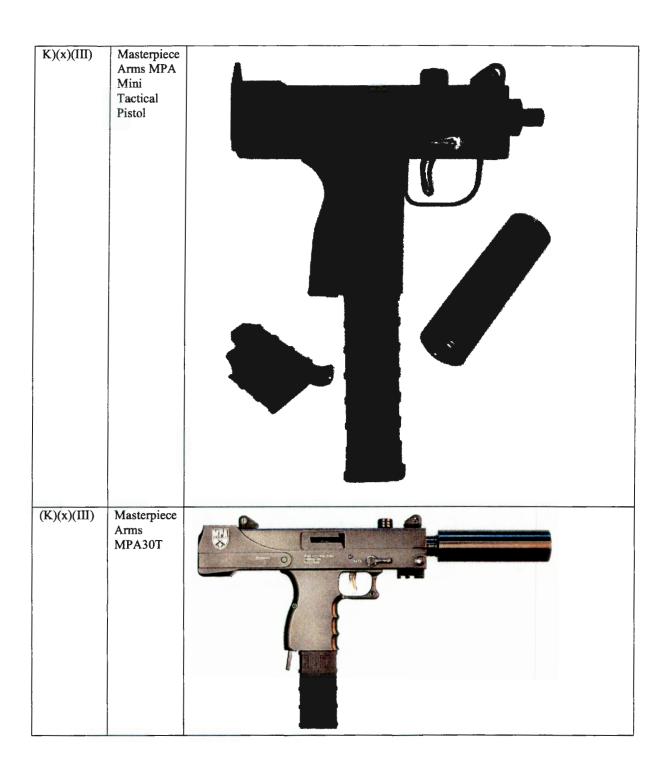










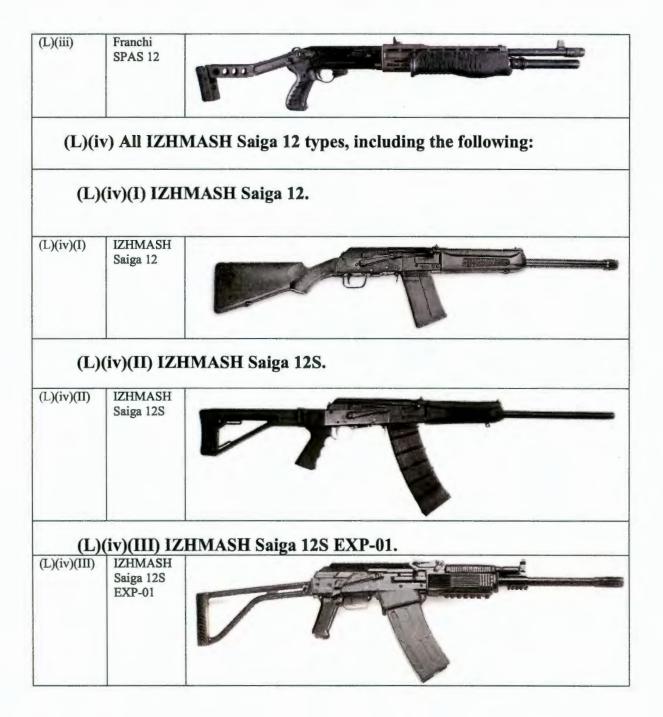




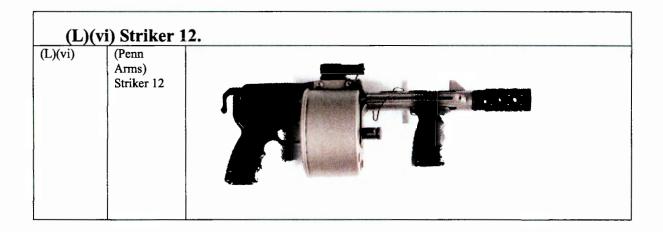




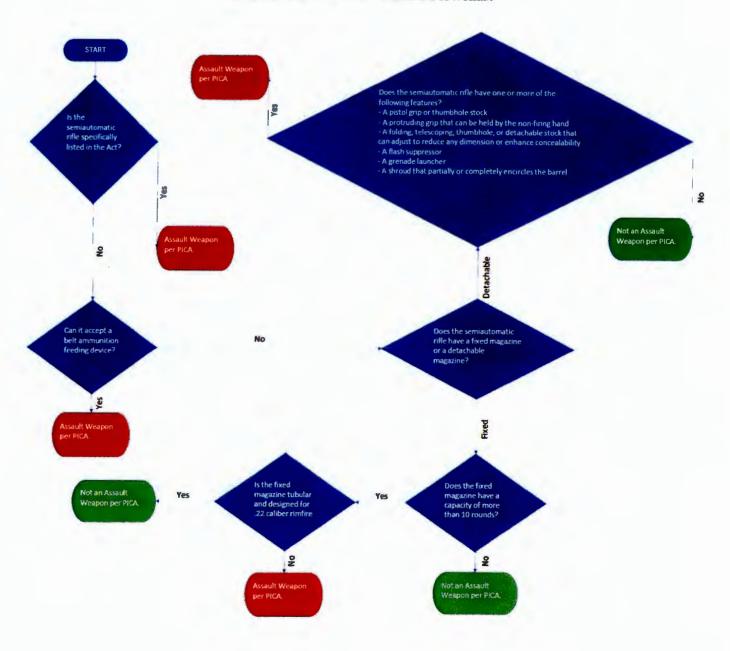
## (L) All of the following shotguns, copies, duplicates, variants, or altered facsimiles with the capability of any such weapon thereof: (L)(i) DERYA Anakon MC-1980, Anakon SD12. (L)(i) **DERYA** Anakon MC-1980 Pictured: Derya Arms, Anakon semiautomatic shotgun, model number unknown (L)(i) DERYA Anakon SD-12 Note: Derya Arms is a Turkish firearms manufacturer. There is no evidence of production of a model SD-10. Pictured is a Hatsan Arms (another Turkish manufacturer), model Escort SD12, semiautomatic shotgun. (L)(ii) Doruk Lethal shotguns. (L)(ii) Doruk Lethal series (Lethal-1 pictured) (L)(iii) Franchi LAW-12 and SPAS 12. (L)(iii) Franchi LAW-12

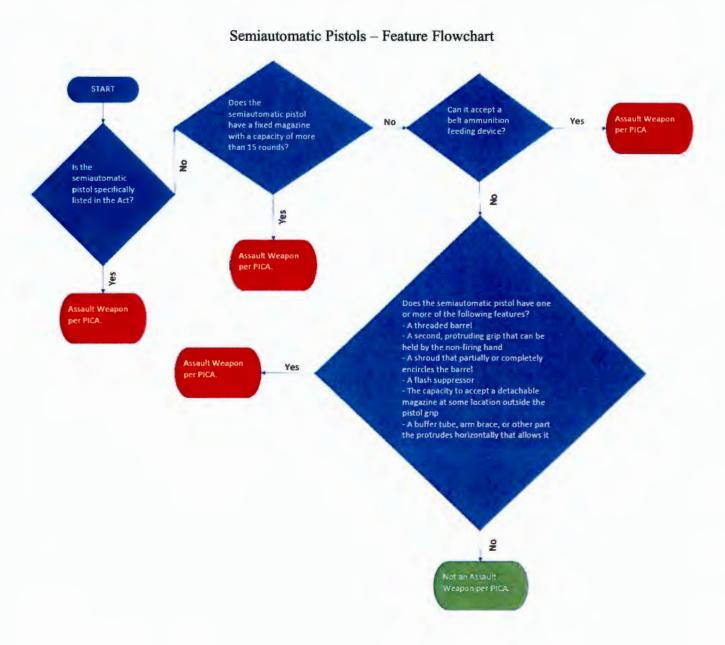


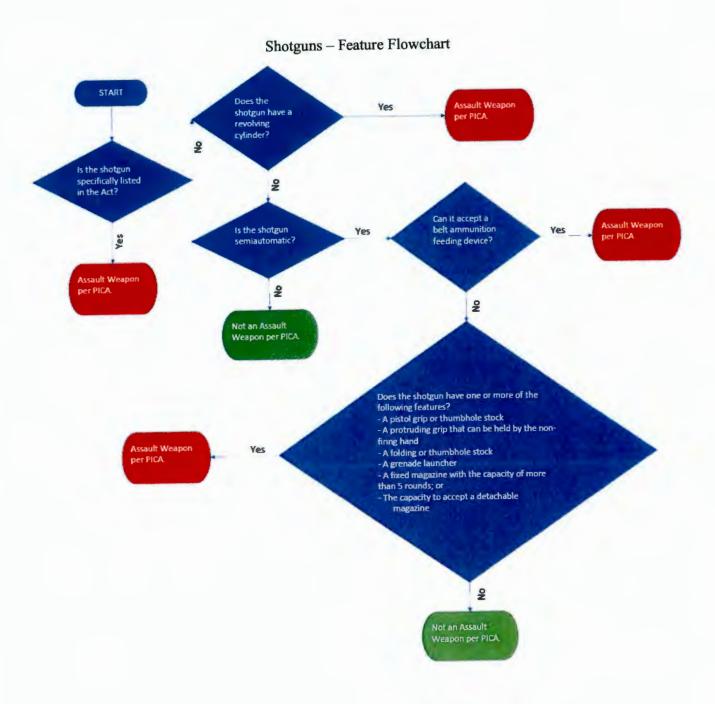




#### Semiautomatic Rifles - Feature Flowchart









## **TACTICAL COMP LAR-47**



AK1275 WITH RRA QUAD RAIL FREE FLOAT HANDGUARD

CALIBEP:	7.62X39MM	BOLT CARRIER SROUP: CHROMED 7.62X38MM				
LOWER RECEIVER:	RRA PROPRIETARY FORGED LAR-47	MAG RELEASE:	AMBIDEXTROUS MAS RELEASE			
upper receiver.	RRA PROPRIETARY FORGED A4	HANDSUARO:	RRA QUAD RAIL FREE FLOAT, CAR LENGTH			
BARREL:	16-INCH CHROME LINEO HBAR, 1:10 RH TWIST	BUTTSTOCK:	RRA DPERATOR CAR STOCK			
MUZZLE BEVIGE:	RRA OPERATOR BRAKE / 5/8-24 THREAD	PISTOL SHIP:	RRA NSP OVERMOLDED PISTOL GRIP			
GAS BLOCK:	RRA FLIP FRONT SIGHT GAS BLOCK ASSEMBLY	WEIGHT:	7.8 POUNDS			
TRIGGER:	RRA TWO STAGE	LENGTH:	34 INCHES / 37.5 INCHES EXTENDED			
TRIGGER GUARD:	RRA WINTER TRIBGER GUARD	THE USES	ONE AK MAGAZINE, CABE, MANUAL AND WARRANTY INFORMATION			











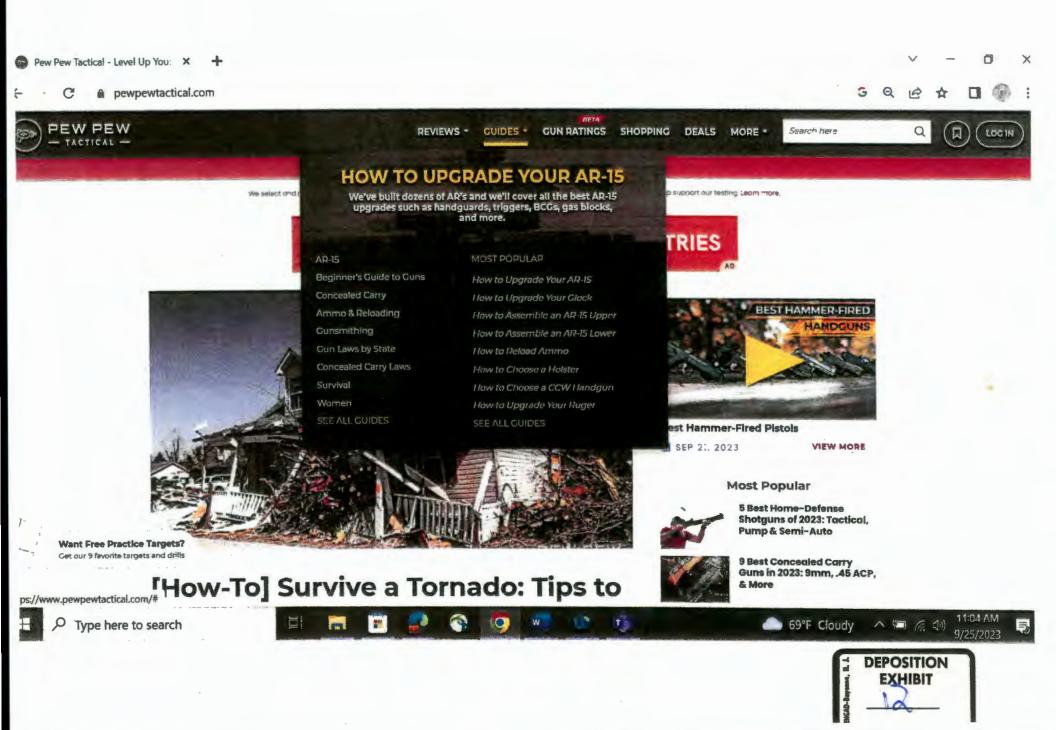








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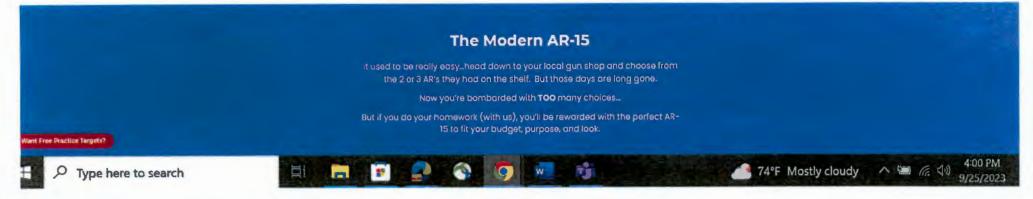
AR-16 Riffes [The Definitive Resource]

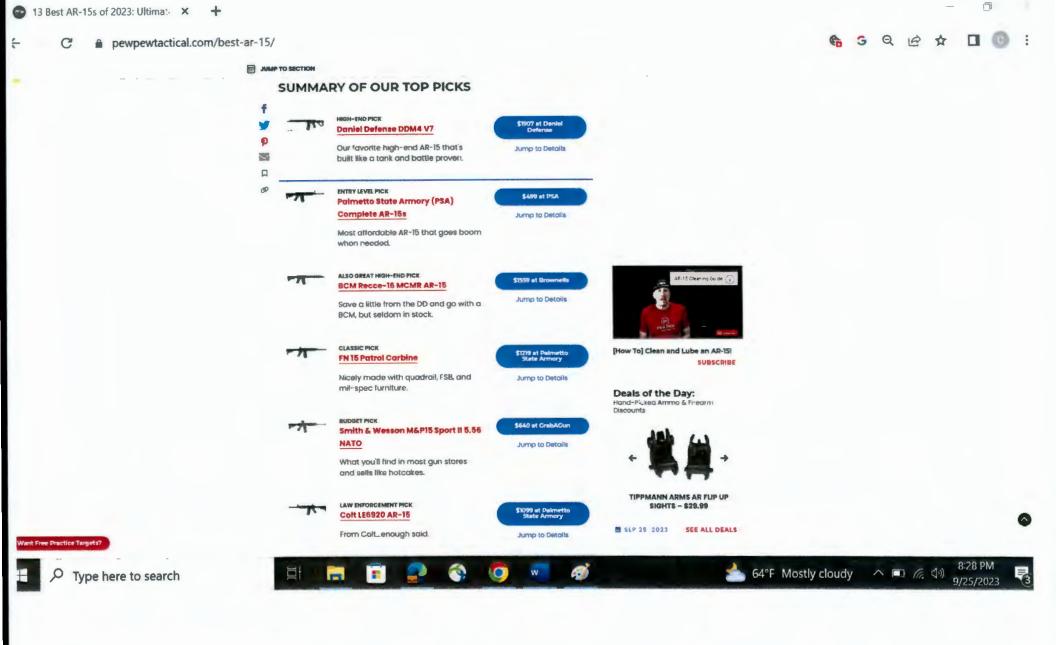
### AR-15 Rifles [The Definitive Resource]



The AR-15 is America's most popular sporting rifle. And because of that, there's dozens of reputable manufacturers, tons of options, and thousands of accessories.

Whether you're looking for the perfect AR-15 as a first-time buyer, or just the perfect upgrades and optics...you're in the right place.





PSAK-47 GF5 Forged Classic Rifle, Redwood | Palmetto State Armory



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## PSAK-47 GF5 FORGED CLASSIC RIFLE, REDWOOD

IN STOCK

## PSAK-47 GF5 FORGED CLASSIC RIFLE, REDWOOD





\$1,029.99

**ADD TO CART** 

#### PRODUCT MANUAL

Handling firearms or firearms parts can expose you to lead and other petroleum products known to the State of California to cause cancer, birth defects, or other reproductive harm. Wash hands thoroughly after handling. For more information go to <a href="https://www.p65warnings.ca.gov">www.p65warnings.ca.gov</a> (CA Health and Safety Code Section 25249.6).

Customers must read Compliance Information before purchasing.

SKU

5655104080

Model Number

✓ norton

»

shopping guaranter

9/2/5/2/025

5655104080

Palmetto State Armory

PSAK-47 GF5 Forged Classic Rifle, Redwood | Palmetto State Armory



#### DAILY DEALS

## **CUSTOMER GALLERY**





## **PRODUCT DETAILS**

#### **DETAILS**

FN Cold Hammer Forged Chrome Moly Vanadium Steel Barrel; Chrome Lined

Stamped Steel Receiver

Blended Hammer Forged 4340 Aircraft Quality Front Trunnion

**Hammer Forged Bolt** 

**Hammer Forged Carrier** 

Side Scope Mount

**Enhanced Extended Safety Lever** 

7.62x39 Caliber

1 in 9.5" Twist

Thread Pitch: M14x1LH

Std. 800-yard rear sight leaf



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ALG AKT Enhanced Trigger With Lightning Bow



#### **DAILY DEALS**

The PSA GF5 AK-47 was designed from the ground up to create a new standard in AK-47 rifles, utilizing all new enhanced precision manufactured parts. Thoroughly tested in development, we tortured tested to 10,000 rounds to ensure a quality product. Not to be satisfied with Just a good AK-47, we kept improving and now are proud to announce our PSAK-47 Gen5 Hammer Forged (GF5) rifle with a hammer-forged barrel, bolt, carrier, and front trunnion.

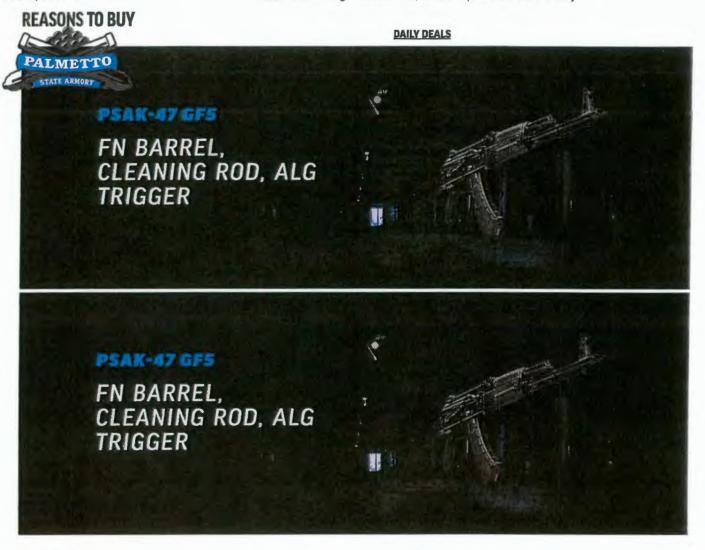
The barrel is a proprietary blend of hammer-forged chrome-moly vanadium made by FN that is referred to as "Machine Gun Steel" by virtue of its use in FN's M249 and M240 weapons. The hammer forging process work hardens the steel, making it more durable. This 16" barrel is magnetic particle inspected, to ensure quality and dependability and is pressed into a hammer forged 4340 AQ front trunnion to ensure the longevity AK-47's are known for. The hardened steel 1mm receiver features an ALG AKT Enhanced Trigger with Lightning Bow, and side rail mount. The front trunnlon and bolt carrier are engraved with GF5 to designate the new GF5 hammer-forged model. The rifle is finished with a classic red wood handguard, stock, and grip. This rifle ships with 30 round magazine (where allowed by law).

Rifles must be shipped to a valid, current Federal Firearms Licensee (FFL). Please have the shipping address of your preferred FFL before placing your order. You will need the FFL information to complete the order. It is the purchaser's responsibility to be aware of the laws in their state regarding high capacity sporting rifles.

As we are transitioning to Soviet Arms, your receivers may be stamped with our new AK Soviet Arms logo on firearms manufactured
after 3/8/2023. This will not affect the quality or function of the firearm as they are the same AK receivers used for our AK's. This will
only be a minor cosmetic change moving towards our Soviet Arms AK's.



PSAK-47 GF5 Forged Classic Rifle, Redwood | Palmetto State Armory



Not to be satisfied with just a good AK-47, we kept improving and now are proud to announce our PSAK-47 Gen5 Hammer Forged (GF5) rifle with a hammer-forged barrel, bolt, carrier, and front trunnion.





## **FN Hammer Forged Chrome-moly Vanadium Barrel**

The GF5 features and upgraded barrel that is referred to as "Machine Gun Steel" due to its use in FN's M249 and M240 platform.

## **ALG AKT Enhanced Trigger**

Upgraded trigger for a smooth and crisp pull.



PSAK-47 GF5 Forged Classic Rifle, Redwood | Palmetto State Armory



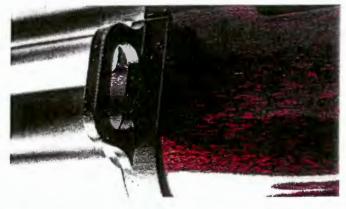


## **Gas Block and Cleaning Rod**

45 Degree Gas block with additional cleaning rod.

## **Side Mount**

TraditionI side rail for an optic mount - Midwest, RS Regulate recommended. Side rails vary GREATLY between countries, so mounts can be finicky due to large tolerances, which is why we recommend certain mounts.





### **Sling Mount**

Traditional AK sling mount whether mounting a com bloc-style sling or modern sling.

## **Spring and Bolt**

Piston operated system with recoil assembly. Hammer Forged Carrier, Boit and Trunnion. This is the heart of the gun where wear happens. We are one of the few companies that does it correctly and has emulated com-bloc guns with Hammer Forged bolt, carrier and trunnion, and gone even further with our AQ4340 trunnion for even more durability.





#### **Front Sight Base**

9/26/2023

ant brake.

### Sight Leaf

Standard 800-yard rear sight leaf.

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#### DAILY DEALS

	Search reviews	Q	Sort by:	Most Recent	~
May 1, 2023					
<b>大大大大</b>					
Red wood AK 47 GF5.					
C					
Fast shippingStr8 out of Box 300+ rounds , no issues prett ALG AKT Enhanced Trigger FAST 4 A little more \$ ,,,,WO it came with 2 mags					tars if
♦ Show details					
Mar 21, 2023					
Solid rifle, minor cosmetic flaws.					
CCC					
Solid rifle, excellent trigger, furniture is mostly gorgeous. Finish	is mostly excellent. Shoots great.	Headspaced co	rrectly.		
Issues I have are the flathead screws that hold on the grip and The front hand <u>Read More</u>	the stock are stripped by the factor	ory. Kinda ugly o	n an othe	rwise beautiful	rifle.
♦ Show details					
		,			
Feb 26, 2023					
CC					
This gun is beautiful and shoots well out of the box.					
Show details					



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Appears to operate at a acceptable level	
PALMETTO	DAILY DEALS
STATE ARMORY	
Oct 14, 2022	
****	
Love this gun	
	·
Really build well and works great so far, only put a few h	undred rounds through it so far but no problem at all.
<b>♦</b> Show details	
Aug 18, 2022	
Aug 10, 2022	
Another PSA winner!	•
	and wood furnitured firearms, but I just love a nice wood grain. Very solid, fit and roup off the bench at 50 yards was ~ 1 1/8" group about 7" high. Two front sight post
- Stow details	
	BACK NEXT >
and the second of the second	
QUESTIONS & ANSWERS	0
A - Coming to the stretter, entry in Q	Sort by: Most Common ~
QUESTION:	
Can this be offered in a 12.5 barrel pistol format with a t	riangle folding brace please?
About PSAK-47 GF5 Forged CHF Classic ALG Rifle, Black	
Asked by Jorge R on Jan 9, 2021	
Was this question helpful? Yes (42)	
Answer	
nortoin	
RM NO. GUARANCEE	

PSAK-47 GF5 Forged Classic Rifle, Redwood | Palmetto State Armory

#### QUESTION:



**DAILY DEALS** 

Tree wood. It's the best type of wood.

Posted by Ryan B on Sep 14, 2022 purchased Jan 10, 2021 Reply Inaccurate \*\*\*

Was this question helpful? Yes (6)

See 2 answers Answer

#### QUESTION:

Can you add a featureless grip for us in California for this model?

Asked by Richard E on Aug 20, 2021

#### BEST ANSWER

The questions here aren't checked by PSA and are only answered by customers.

Posted by Brian P. on Dec 13, 2022 Reply Inaccurate \*\*\*

Was this question helpful? Yes (6)

Answer

#### QUESTION:

4th PSAK I've purchased and all came with mags. Any reason this GF5 did not?

Asked by A shopper on Feb 9, 2021

#### BEST ANSWER:

My GF5 came with a 30 round PMAG. Do you live in a magazine capacity restricted state? That might be why

Posted by Mohibullah S. on Mar 4, 2021 purchased Feb 3, 2021 Reply Inaccurate \*\*\*

Was this question helpful? Yes (4)

See 2 answers Answer

#### QUESTION:

What magazines have you tested with this? Can I use surplus or just Magpul?

Asked by Mark F on Jan 11, 2021

#### **BEST ANSWER**

Most quality steel and polymer magazines will work with our AK's. Some may require minor fitment as they were made in various com-bloc countries

Best Regards,

**PSA Customer Service.** 

Posted by Josiah M. STAFF on Jan 12, 2021 Reply Inaccurate ...

Was this question helpful? Yes (2)



Answer

PSAK-47 GF5 Forged Classic Rifle, Redwood | Palmetto State Armory

QUESTION:



**DAILY DEALS** 

typically every week day.. check at 4pm EST

Posted by Corey F. on Mar 26, 2021 purchased Jan 7, 2021 Reply Inaccurate · · ·

Was this question helpful? Yes (1)

**Answer** 

BACK

NEXT >

## **RETAIL STOCK**



1

Please note that stock-status may differ from what is represented below.

Please call to verify actual stock-status before arriving to store.

Please read all our Terms & Conditions for <u>Retail Firearam Transfers.</u>

#### **VISIT US IN STORE**



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3760 Fernandina Rd							
Columbia, SC 29210							
(803) 551-2680							

**MORE INFO** 

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Greenville - Store &	i

Range 1040-A Woodruff Rd Greenville, SC 29607 (864) 605-6680

**MORE INFO** 

OUT OF STOCK

Summerville - Store & Ran				
366 E. 5th North Street	2			
Summerville, SC 29483	9			
843) 900-9000	ſ.			

**MORE INFO** 

## COMPLIANCE

### **Shipping Restrictions**

It is the customer's responsibility for understanding state laws regarding all purchases made. For a comprehensive list of all Shipping Restrictions, please refer to our Shipping Restrictions By State Page found Here.

## **All NFA Rules Apply**

These items are controlled by the U.S. Government and authorized for export only to the country of ultimate destination for use by the ultimate consignee or end-user(s) herein identified. They may not be resold, transferred, or otherwise disposed of, to any other country or to any person other than the authorized ultimate consignee or end-user(s), either in their original form or after being incorporated into other items, without first obtaining approval from the U.S. government or as otherwise authorized by U.S. law and regulations.

Magazines will be removed from firearms when shipping to states with magazine capacity restrictions.

Handling firearms or firearms parts can expose you to lead and other petroleum products known to the State of California to cause cancer, birth defects, or other reproductive harm. Wash hands thoroughly after handling. For more information go to www.p65warnings.ca.gov (CA Health and Safety Code Section 25249.6).

## WARRANTY





PSAK-47 GF5 Forged Classic Rifle, Redwood | Palmetto State Armory



# AMERICAN MADE. FOR LIFE.



## **FULL LIFETIME WARRANTY.**

Palmetto State Armory firearms are covered by an industry leading FULL LIFETIME WARRANTY. This extends beyond the original purchaser. We want the person who bought a great quality firearm at an excellent price to have comfort in knowing that no matter what, the firearm can be fixed at no additional cost.

### THIS INCLUDES SHIPPING BOTH WAYS.

We strive for excellence all the way through production and hope customers never have to use this warranty but we also pride ourselves in 99% non-repair/return ratio. It is there for peace of mind so that the consumer can be confident in their purchase. Should the consumer ever need to contact us regarding a repair under the warranty, simply use our <u>contact form</u> or give us a call at <u>877-560-7229</u>.

Palmetto State Armory firearms and parts are backed by our Full Lifetime Warranty. Our PSA firearms and parts are warranted to be free from defects in materials and craftsmanship for the serviceable lifetime of the firearm or part. All Palmetto State Armory barrels are machined and guaranteed to be concentric with the bore of our barrels.

### For the Life of our product

The liability of Palmetto State Armory under this warranty shall be limited solely to the obligation to repair or replace the firearm/part or defect at its discretion, and to pay transportation and insurance charges for return of the firearm to the owner for a rightful warranty claim. This warranty is transferable for the serviceable lifetime of the firearm or part. Modification of firearm will void this warranty. This warranty does not cover normal wear or any damage resulting from careless handling, neglect, repairs and adjustments, corrosion, improper, substandard or defective ammunition.

#### What we don't cover

Under no circumstances shall Palmetto State Armory be responsible for incidental or consequential damages with respect to economic loss or injury to property, whether as a result of express or implied warranty, negligence or otherwise. Some states do not allow the exclusion or limitation of incidental or consequential damages, so the above limitation may not apply to you. Palmetto State Armory will



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not be responsible for the results of careless handling, unauthorized adjustments, defective, low-quality, reloaded, or improper amrall before continuous and tear, or unreasonable use.

#### Initiating a claim

To initiate a Warranty claim, call Palmetto State Armory Customer Service:

Hours: Monday through Friday, 9am - 5pm EST

**Email: Contact Form** 

- Customer service will issue an RMA number to allow for the return of the firearm.
- Warranty claims must have this RMA filled out, and included in the box with the firearm or part.
- The firearm or part concerned must be shipped using the prepaid label our representative emails to you.

Palmetto State Armory will pay shipping and insurance charges for the return of a firearm or part to its owner or FFL, if the related claim is a proper claim for warranty work. If Palmetto State Armory is unable to fix the original serial number, a new one will be sent out, but must go to an FFL for transfer back to the customer. Another background check will be completed at the time of transfer. Palmetto State Armory is not responsible for transfer fees at the FFL.

DOWNLOAD REPAIR REQUEST FORM



A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed.



PSAK-47 GF5 Forged Classic Rifle, Redwood | Palmetto State Armory



DAILY DEALS

Questions? Need help? Call us: (877) 560-7229













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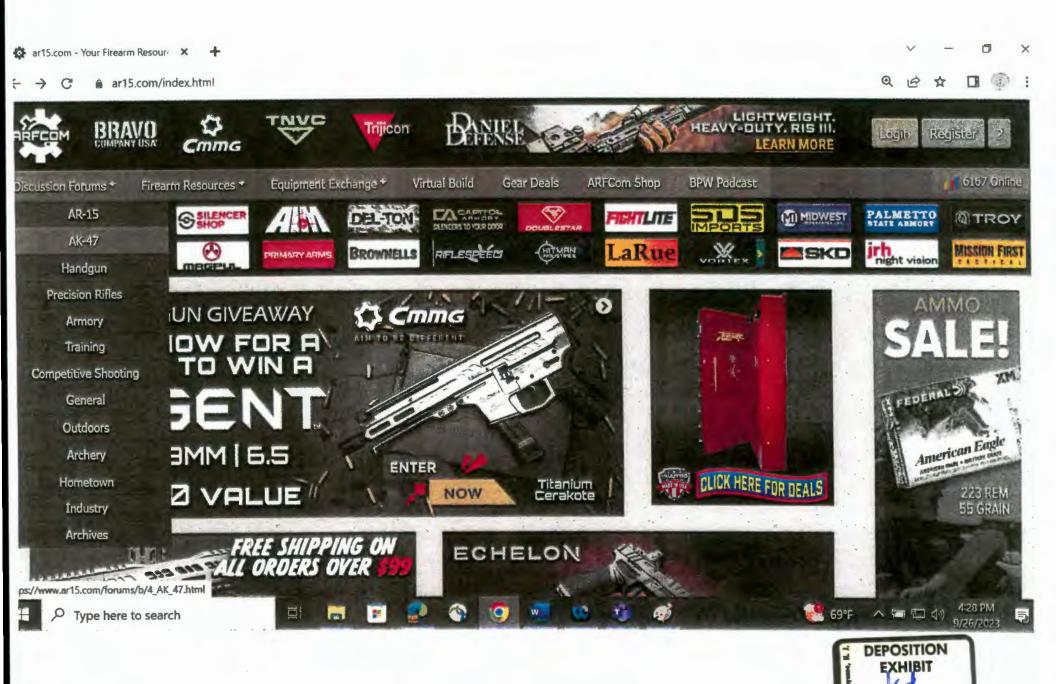
**Product Manuals** 

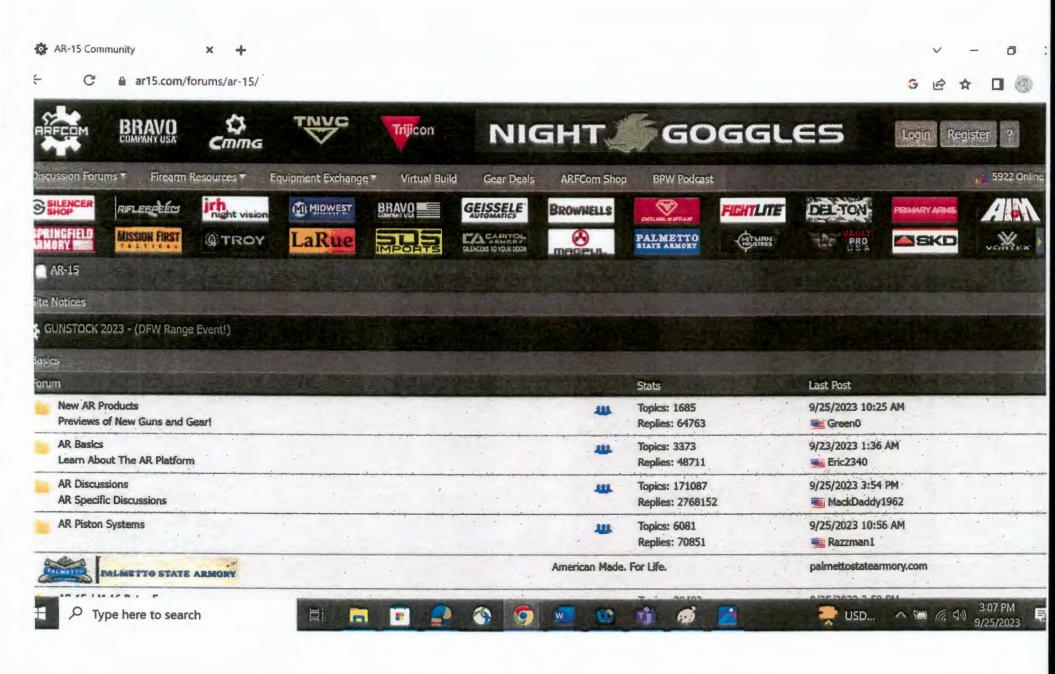
California Buying Guide

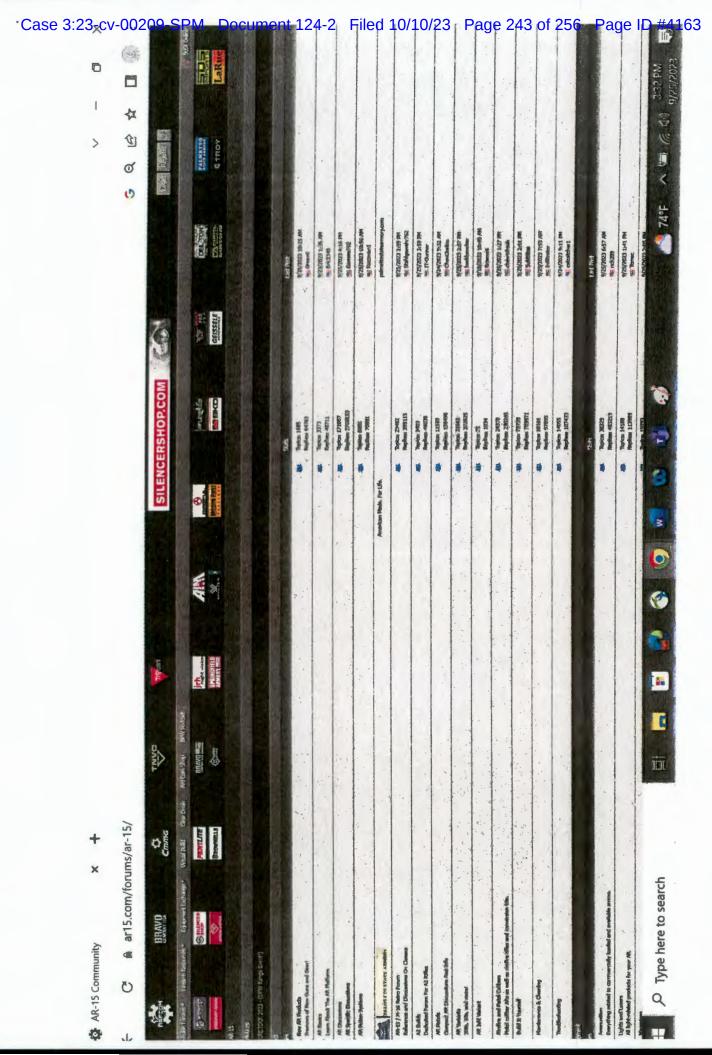
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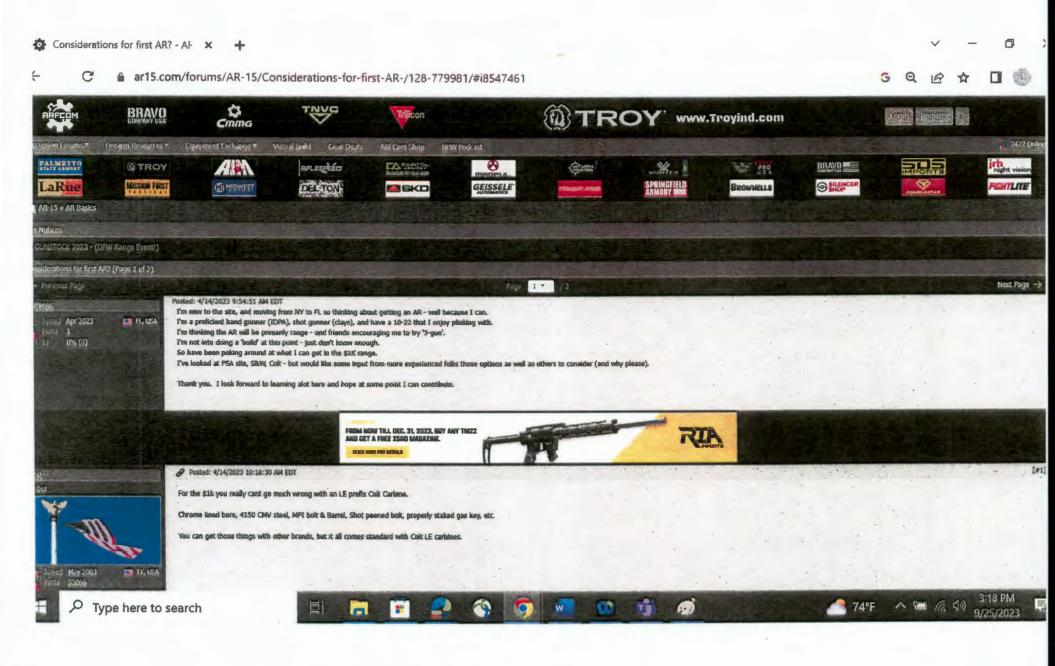


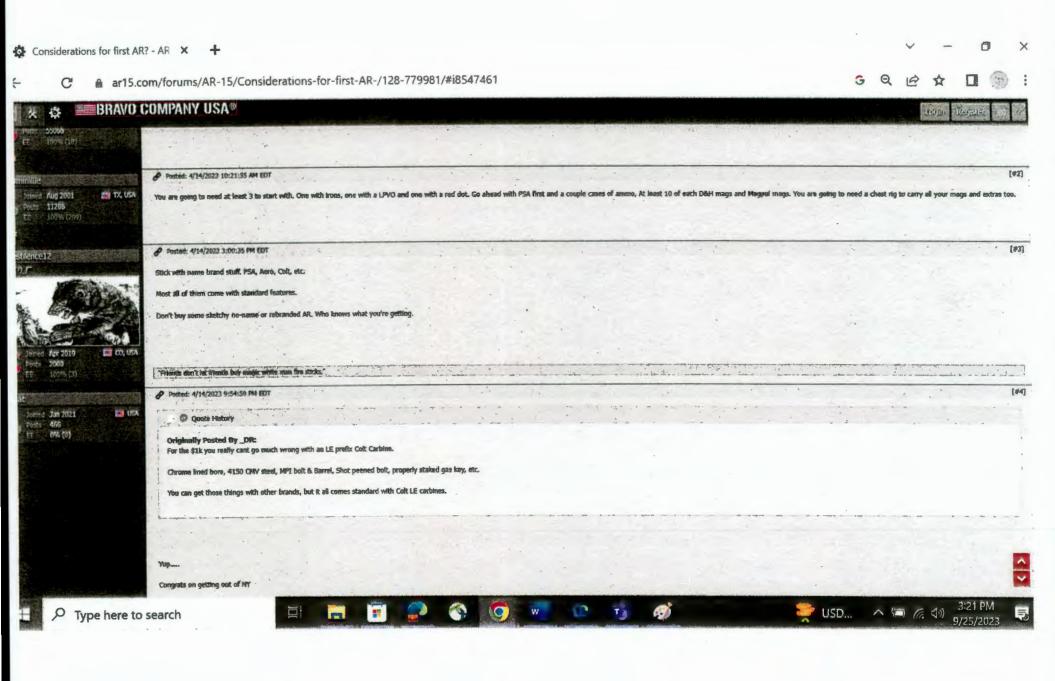
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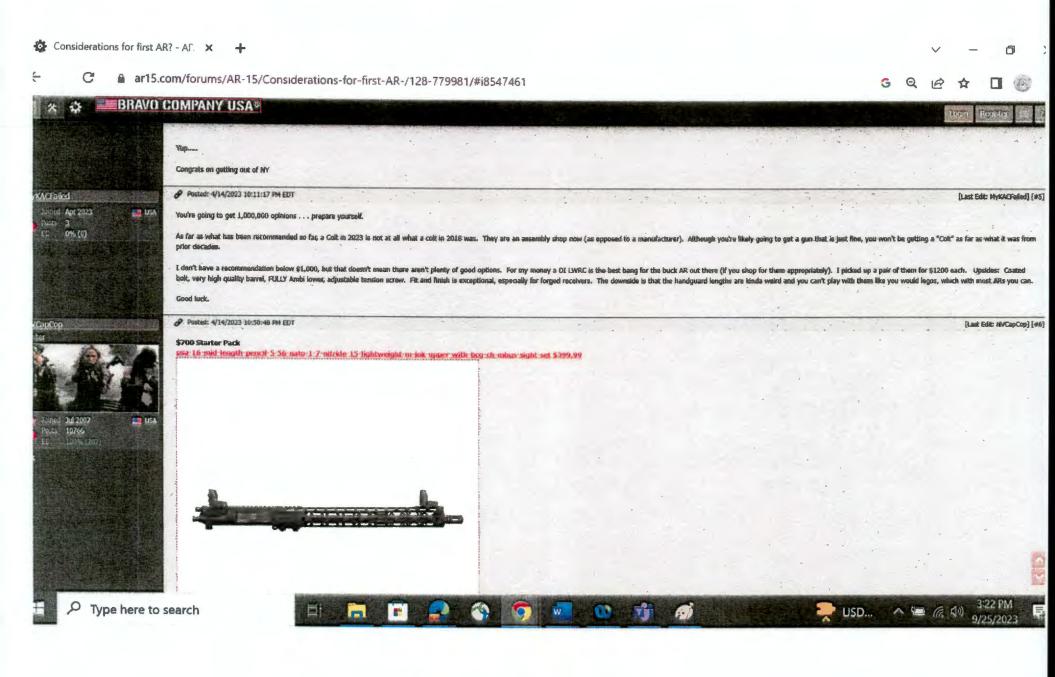


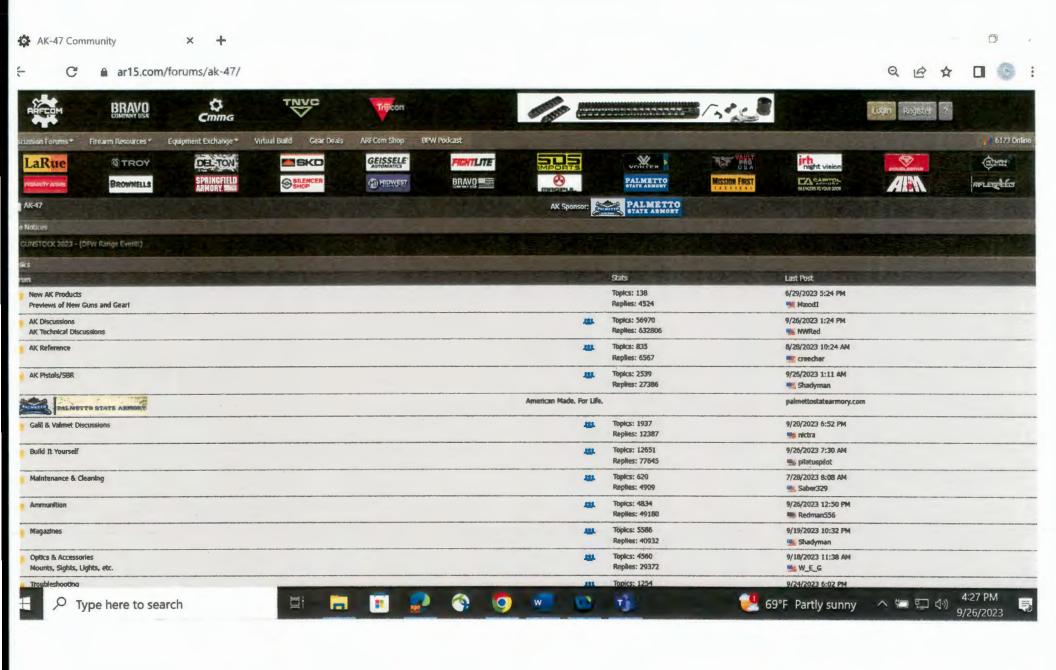
















## RUGER AMERICAN° RIFLE PREDATOR

## RELIABILITY, VERSATILITY, MPERFORMANCE AND AFFORDABILITY.

Model No.	Caliber	Capacity	Barrel Length	Stock	Magazine	Barrel Finish	Thread Pattern	Model Option	Suggested Retail		
6973	6.5 Creedmoor	4	22°	Moss Green Synthetic	Flush-Fit	Matte Black	5/8°-24	Right- Handed	\$619.00	Spec Sheet Buy Now Available	
6974	308 Win	4	18*	Moss Green Synthetic	Flush-Fit	Matte Black	5/8*-24	Right- Handed	\$619.00	Spec Sheet Buy Now Available	•
16977	6.5 Creedmoor	4	22*	Moss Green Synthetic	Flush-Fit	Matte Black	5/8"-24	Left- Handed	\$709.00	Spec Sheet Buy Now Available	•
26916	243 Win	4	22"	Moss Green Synthetic	Flush-Fit	Matte Black	5/8"-24	Left- Handed	\$709.00	Spec Sheet Buy Now Available	
26917	7mm-08 Rem	4	22°	Moss Green Synthetic	Flush-Fit	Matte Black	5/8"-24	Left- Handed	\$709.00	Spec Sheet Buy Now Available	
26918	308 Win	4	22"	Moss Green Synthetic	Flush-Fit	Matte Black	5/8*-24	Left- Handed	\$709.00	Spec Sheet Buy Now Available	•
26922	6.5 Grendel	10	22"	Moss Green Synthetic	Metal AR- Style	Matte Black	5/8"-24	Right- Handed	\$669.00	Spec Sheet Buy Now Available	
26944	223 Rem	10	22°	Moss Green Synthetic	AR-Style	Matte Black	1/2*-28	Right- Handed	\$669.00	Spec Sheet Buy Now Available	•
26971	204 Ruger	10	22°	Moss Green Synthetic	Al-Style	Matte Black	1/2*-28	Right- Handed	\$669.00	Spec Sheet Buy Now Available	•
26973	6.5 Creedmoor	3	22°	Moss Green Synthetic	Al-Style	Matte Black	5/8"-24	Right- Handed	\$669.00	Spec Sheet Buy Now Available	•
6945	22-250 Rem	4	22°	Moss Green Synthetic	Flush-Fit	Matte Black	1/2"-28	Right- Handed	\$619.00	Spec Sheet Buy Now Limited Availability	•
26948	6mm Creedmoor	3	22*	Moss Green Synthetic	Al-Style	Matte Black	5/8"-24	Right- Handed	\$669.00	Spec Sheet Buy Now Limited Availability	•
16973	6.5 Creedmoor	4	22*	Moss Green Synthetic	Flush-Fit	Matte Stainless	5/8*-24	Right- Handed	Sports South Distributor Exclusive	Spec Sheet Buy Now Limited Availability	•
26987	350 Legend	5	16.38"	Black Synthetic	AR-Style	Flat Dark Earth Cerakote®	1/2°-28 x 0.4°	Right- Handed	Davidson's Distributor Exclusive	Spec Sheet Buy Now Limited Availability	•
26991	350 Legend	5	20°	Black Synthetic	AR-Style	Stainless	1/2"-28 x 0.4"	Right- Handed	Davidson's Distributor Exclusive	Spec Sheet Buy Now Limited Availability	•
36900	350 Legend	5	22*	Black Synthetic	AR-Style	Matte Black	1/2"-28 x 0.4"	Right- Handed	Lipsey's Distributor Exclusive	Spec Sheet Buy Now Limited Availability	•
36902	350 Legend	5	22"	Moss Green Synthetic	AR-Style	Matte Black	1/2"-28 x 0.4"	Right- Handed	Big Rock Sports Distributor Exclusive	Spec Sheet Buy Now Limited Availability	



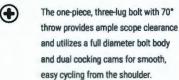
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#### Ruger American® Rifle Predator

Ruger Marksman Adjustable™ trigger offers a crisp release with a pull weight that is user adjustable between 3 and 5 pounds, allowing shooters to make that perfect shot.



Outstanding accuracy helps make every hunt a success.

Ergonomic, lightweight synthetic stock designed for quick, easy handling blends a classic look with modem forend contouring and grip serrations.

Patented Power Bedding\*\*, integral bedding block system positively locates the receiver and free-floats the barrel

Heavier tapered, threaded barrel with factory-installed thread protector is cold hammer-forged, resulting in ultraprecise rifling that provides exceptional accuracy and longevity.

Soft rubber buttpad is crafted for

for outstanding accuracy.

The visible, accessible and easy-toactuate tang safety provides instant security.



maximum recoil reduction.

Factory-installed, one-piece Picatinny scope base.

> Also includes: one magazine; sling swivel studs.

01:54

Ruger American® Rifle 6mm Creedmoor

TV Spot

Larry Weishuhn TV Spot

AR/Al-Style Mag Well Disassembly **Features** 

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AR/AI-Style Mag Well Reassembly Ruger American® Rifle Cheekpad Disassembly/Reassembly

PRODUCT REGISTRATION LOCKING DEVICE



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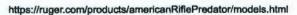








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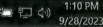
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